

# **NOTICE**

**All drawings located at the end of the document.**



**Final  
Environmental Restoration  
RFCA Standard Operating Protocol  
for Routine Soil Remediation**



**January 2002**

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Approval received from the Colorado Department of Public Health and Environment  
January 11, 2002

Approval letter contained in the Administrative Record



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## ACRONYMS

ACM	asbestos-containing material
AL	action level
ALARA	As Low As Reasonably Achievable
ALF	Action Levels and Standards Framework for Surface Water, Ground Water, and Soils
Am	americium
AME	Actinide Migration Evaluation
AOC	area of concern
APEN	Air Pollutant Emission Notice
AR	Administrative Record
ARAR	Applicable or Relevant and Appropriate Requirement
ASD	Analytical Services Division
bgs	below ground surface
BMP	best management practice
BS	building sump
BZ	Buffer Zone
BZSAP	Buffer Zone Sampling and Analysis Plan
CAD/ROD	Corrective Action Decision/Record of Decision
CAQCC	Colorado Air Quality Control Commission
CCR	Code of Colorado Regulations
CDPHE	Colorado Department of Public Health and Environment
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
CHWA	Colorado Hazardous Waste Act
CID	Cumulative Impacts Document
cm/sec	centimeters per second
CMS/FS	Corrective Measure Study/Feasibility Study
CO	carbon monoxide
COC	contaminant of concern
cpm	counts per minute
CRA	Comprehensive Risk Assessment
CRZ	Contaminant Reduction Zone
CWA	Clean Water Act
D&D	Decontamination & Decommissioning
DAC	derived air concentration
DNAPL	dense nonaqueous phase liquid
DOE	U S Department of Energy
DOT	U S Department of Transportation
dpm	disintegrations per minute
dpm/100 cm <sup>2</sup>	disintegrations per minute per 100 square meters
DQO	data quality objective
EDDIE	Environmental Data Dynamic Information Exchange

EDE	effective dose equivalent
EPA	U S Environmental Protection Agency
ER	Environmental Restoration
ER RSOP	ER RSOP for Routine Soil Remediation
ESA	Endangered Species Act
EZ/SCA	Exclusion Zone/Soil Containment Area
FD	foundation drain
FIDLER	Field Instrument for the Detection of Low Energy Radiation
FIP	Field Implementation Plan
ft	feet
ft <sup>2</sup>	square feet
ft/sec	feet per second
FWPCA	Federal Water Pollution Control Act
FY	fiscal year
GIS	Geographic Information System
GPS	Global Positioning System
H&S	health and safety
HAP	hazardous air pollutant
HASP	Health and Safety Plan
HPGe	high-purity germanium
hr	hour
HRR	Historical Release Report
IA	Industrial Area
IA Strategy	Industrial Area Characterization and Remediation Strategy
IAG	Interagency Agreement
IASAP	Industrial Area Sampling and Analysis Plan
ICD	Initial Conceptual Design
IDC	Item Description Code
IDW	inverse distance weighting
IGD	Implementation Guidance Document
IHSS	Individual Hazardous Substance Site
IM/IRA	Interim Measure/Interim Remedial Action
IMP	Integrated Monitoring Plan
ISEDS	Integrated Sitewide Environmental Data System
ISMS	Integrated Safety Management System
IWCP	Integrated Work Control Program
JHA	Job Hazard Analysis
K-H	Kaiser-Hill Company, L L C
LCDB	Land Configuration Design Basis
LDR	Land Disposal Restriction
LHSU	lower hydrostratigraphic unit
LL	low-level
LLM	low-level mixed
LNAPL	light nonaqueous phase liquid
LRA	Lead Regulatory Agency
m <sup>3</sup>	cubic meters

10

mg/kg	milligrams per kilogram
mrem	millirem
mrem/yr	millirems per year
NAAQS	National Ambient Air Quality Standard
nCi/g	nanocurie per gram
NCP	National Contingency Plan
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NPWL	New Process Waste Lines
NSD	new source detection
NSR	New Source Review
NTS	Nevada Test Site
OPWL	Original Process Waste Lines
OSHA	Occupational Safety and Health Act
OU	Operable Unit
PAC	Potential Area of Concern
PAM	Proposed Action Memorandum
PCB	polychlorinated biphenyl
pCi/g	picocuries per gram
pCi/L	picocuries per liter
PCOC	potential contaminant of concern
PM	particulate matter
PMJM	Preble's meadow jumping mouse
POC	point of compliance
POE	point of evaluation
PPE	personal protective equipment
ppm	parts per million
PSD	Prevention of Significant Deterioration
Pu	plutonium
PU&D	Property Utilization and Disposal
QA	quality assurance
QAPP	Quality Assurance Program Plan
QC	quality control
R&D	research and development
RAAMP	Radioactive Ambient Air Monitoring Program
RACT	reasonably available control technology
RADMS	Remedial Action Decision Management System
RADP	Remedial Action Decontamination Pad
RAO	remedial action objective
RBZ	Radiological Buffer Zone
RCRA	Resource Conservation and Recovery Act
RCT	Radiological Control Technician
RFCA	Rocky Flats Cleanup Agreement
RFCAB	Rocky Flats Citizen Advisory Board



RFCoLG	Rocky Flats Coalition of Local Governments
RFETS (or Site)	Rocky Flats Environmental Technology Site
RFFO	Rocky Flats Field Office
RFI/RI	RCRA Facility Investigation/Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
RSAL	Radionuclide Soil Action Level
RSOP	RFCA Standard Operating Protocol
RSP	Radiological Safety Practices
RWP	Radiological Work Permit
SAP	Sampling and Analysis Plan
SCO	surface-contaminated object
SEP	Solar Evaporation Ponds
SID	South Interceptor Ditch
SNM	Special Nuclear Material
STP	Sewage Treatment Plant
SVOC	semivolatile organic compound
SWD	Soil Water Database
SWWB	Site-Wide Water Balance
TEDE	total effective dose equivalent
TPH	total petroleum hydrocarbons
TRU	transuranic
TSCA	Toxic Substances Control Act
TSP	total suspended particulate
U	uranium
UBC	Under Building Contamination
UCL	upper confidence limit
$\mu\text{g}/100\text{ cm}^2$	micrograms per 100 square centimeters
$\mu\text{g}/\text{kg}$	microgram per kilogram
UHSU	upper hydrostratigraphic unit
UST	underground storage tank
VOC	volatile organic compound
WEMS	Waste and Environmental Management System
WGI	Waste Generating Instruction
WIPP	Waste Isolation Pilot Plant
WRE	waste release evaluation
WRR	Waste Requirements Representative

## EXECUTIVE SUMMARY

The Environmental Restoration (ER) Rocky Flats Cleanup Agreement (RFCA) Standard Operating Protocol (RSOP) for Routine Soil Remediation (ER RSOP) addresses routine remediation of soil and associated debris at Individual Hazardous Substance Sites (IHSSs), Potential Areas of Concern (PACs), Under Building Contamination (UBC) sites, and other areas, as necessary, at the Rocky Flats Environmental Technology Site (RFETS). Routine remediation of soil and buried debris will primarily consist of excavation and offsite disposal, with offsite treatment as required to meet regulatory and receiver site requirements.

This ER RSOP does not address remediation at the Present Landfill, Original Landfill, Solar Evaporation Ponds (SEP), 903 Lip Area and Americium (Am) Zone, groundwater contaminant plumes, or other nonroutine remediations. These projects will be addressed in separate decision documents.

The ER RSOP will

- Provide a consistent approach to accelerated action decisions and remediation activities, which will enhance safety, quality, and compliance,
- Streamline the decision-making process by relying on one decision document instead of many, and
- Accelerate remediation schedules by eliminating numerous review cycles.

There are more than 200 potential release sites in the RFETS Buffer Zone (BZ) and Industrial Area (IA). These sites are being considered for routine remediation under this RSOP because (1) the sites have similar potential contaminants of concern (PCOCs) that consist of radionuclides, organic compounds, or metals, (2) the sites may have debris (pipelines, wood, concrete, asphalt, drums, metal, plastics, rubber, fiberglass, or other debris) associated with the soil, (3) contamination is limited to surface or subsurface soil, (4) subsurface soil can be associated with UBC sites and pipelines, (5) remediation of these sites does not require special engineering designs, and (6) these sites can be remediated by excavation and shipment of waste to offsite locations. The ER RSOP also covers foundation drains, tanks, and asphalt and concrete that are part of roads, parking lots, and orphan slabs.

The ER RSOP remediation process starts after characterization of the potential release sites. RFETS staff, in consultation with the regulatory agencies, reviews the characterization data and a decision is made whether site remediation is required, and if so, how much. Remediation decisions include evaluation of stewardship and As Low As Reasonably Achievable (ALARA) considerations. Excavation of soil and debris is conducted in conjunction with "in-process" sampling to determine when remediation goals are achieved and confirmation sampling will verify that remediation goals are met. This process results in an efficient, almost real-time implementation of characterization and remediation activities. The excavated soil and debris are

segregated by waste type for disposal and all excavations are backfilled, stabilized, and revegetated

Supporting information provided in this RSOP includes regulatory requirements and processes for environmental protection, work controls, waste management, decision management, health and safety (H&S), and quality assurance (QA)

RFCA mandates the incorporation of National Environmental Policy Act (NEPA) values into RFETS decision documents. This ER RSOP describes potential environmental impacts that may be associated with activities covered under this RSOP and satisfies the RFCA requirement for a "NEPA-equivalency" assessment of environmental consequences.

## 1.0 INTRODUCTION

Nearly 40 years of nuclear weapons production at the Rocky Flats Environmental Technology Site (RFETS or Site) resulted in soil and debris potentially contaminated with chemical and radioactive substances, which may pose a hazard to human health and the environment. Potential threats were evaluated using a screening-level risk assessment in accordance with Rocky Flats Cleanup Agreement (RFCA) Attachment 4 (DOE et al. 1996) to determine potential human health and environmental risks posed by release sites. The results of this evaluation indicate certain risks to human health and the environment exist, and that accelerated actions, in accordance with this Environmental Restoration (ER) RFCA Standard Operating Protocol (RSOP) for Routine Soil Remediation (ER RSOP), may be warranted at these release sites.

The potential contaminants of concern (PCOCs) in soil and debris are related to plutonium (Pu) and uranium (U) processing activities and associated support facilities and functions. The locations and nature of processes that contributed to the potential releases are well documented. PCOCs associated with past operations are fairly well understood and are similar at many release sites. Based on process knowledge and analytical data, PCOCs include radionuclides (plutonium ranging from background to 152,000 picocuries per gram [pCi/g]), metals (sodium ranging from background to 30,800,000 milligrams per kilogram [mg/kg]), volatile organic compounds (VOCs) (carbon tetrachloride ranging from nondetect to 690,000,000 micrograms per kilogram [µg/kg]), and semivolatile organic compounds (SVOCs) (phenanthrene ranging from nondetect to 220,000 µg/kg).

Potential soil and debris (pipelines, wood, concrete, asphalt, drums, metal, plastic, rubber, fiberglass, or other debris) contamination from past operations at RFETS may exist in a number of configurations, including surface contamination (within the top 6 inches), subsurface contamination (below the top 6 inches but without structural complications), contamination under building floor slabs, and subsurface contamination associated with process waste pipelines, storm drains, and sanitary sewer lines. Regardless of the configuration, remediation options for contaminated soil and debris are limited because of technical feasibility constraints related to effectiveness, implementability, and cost.

The ER RSOP addresses routine remediation of soil and associated debris at Individual Hazardous Substance Sites (IHSSs), Potential Areas of Concern (PACs), Under Building Contamination (UBC) sites, and other areas, as necessary, at RFETS. The following routine actions are described in this RSOP:

- Excavation of soil contaminated above agreed-upon cleanup levels and associated debris, and offsite disposal with or without offsite treatment, and
- Excavation of soil contaminated above agreed-upon cleanup levels and associated debris, onsite thermal desorption treatment of VOC-contaminated soil, and onsite backfilling or offsite disposal

Routine remediation of contaminated soil and buried debris will primarily consist of excavation and offsite disposal, with offsite treatment as required to meet regulatory and receiver site

requirements. The ER RSOP also provides for onsite treatment using thermal desorption, with soil backfilling if the treated soil meets onsite backfill criteria and thermal desorption is economically favorable and protective of human health and the environment. Routine remediation of contaminated pipelines, drains, slabs, and foundations will primarily consist of excavation and offsite disposal. Consistent with previous remediations and investigations, it is anticipated that most contaminated soil and debris will be low-level (LL), low-level mixed (LLM), or hazardous waste. Nonroutine sanitary waste and small amounts of transuranic (TRU) and TRU-mixed waste may also be found.

The ER RSOP provides for the accelerated action cleanup of soil and debris and is consistent with the long-term remediation objectives of leaving RFETS in a condition that is protective of human health and the environment and allows future land uses consistent with the Rocky Flats Vision. The final cleanup levels and long-term monitoring requirements will be determined in the Corrective Action Decision/Record of Decision (CAD/ROD). Long-term monitoring requirements will integrate Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and Resource Conservation and Recovery Act (RCRA) requirements with Comprehensive Risk Assessment (CRA) requirements. Post-remediation stewardship of remediated areas will include routine monitoring under the Integrated Monitoring Plan (IMP) (DOE 2000a), maintenance of revegetated areas, and, if necessary, additional monitoring and access restrictions. Because the RSOP addresses accelerated actions, long-term stewardship activities cannot be fully addressed at this time. These activities will be described in the RFETS Stewardship Plan (in preparation).

## **1.1 PURPOSE AND GOALS**

The purpose of the ER RSOP is to serve as the decision document for routine soil and debris remediation at RFETS. This RSOP addresses accelerated action decisions and routine remediation processes for surface and subsurface soil and debris.

The goal of the ER RSOP is to provide for safe and effective accelerated actions to address risks posed by contaminated soil and debris in IHSSs, PACs, and UBC sites at RFETS. To meet this goal, the following actions will be implemented through the ER RSOP:

- Define a process for implementing soil and associated debris remediation that
  - Protects human health and the environment,
  - Meets RFCA cleanup goals,
  - Minimizes generation of waste,
  - Favors offsite disposal of waste, and
  - Is cost effective,
- Coordinate remediation with the decommissioning schedule,
- Use the RFCA consultative process for accelerated action decisions,
- Ensure that remediation does not pose unacceptable risks to workers or the public, and

- Provide documentation for closure of IHSSs and PACs that are also RCRA units

## **1.2 REGULATORY FRAMEWORK**

RFCA, signed by the U S Department of Energy (DOE), Colorado Department of Public Health and Environment (CDPHE), and U S Environmental Protection Agency (EPA) (the RFCA Parties), on July 19, 1996, provides the regulatory framework for the cleanup of RFETS (DOE et al 1996) RFCA streamlines remediation of the Site through accelerated actions that include characterization, remediation, and closure of IHSSs, PACs, and UBC sites at RFETS

RFCA provides the regulatory framework for DOE response obligations under CERCLA and corrective action obligations under RCRA The RFCA accelerated action process incorporates the requirements of CERCLA and RCRA After accelerated actions are complete, DOE will develop a Remedial Investigation/Feasibility Study (RI/FS) to describe the completed actions and a CRA to verify that potential contamination remaining at RFETS is within acceptable risk levels as defined by CERCLA and implemented through RFCA DOE will also develop a CAD/ROD that will include the final action and post-closure monitoring and operation requirements, including five-year reviews of the Site, to evaluate whether the remedies, including any institutional controls, are effective

Attachment 5 to RFCA, Action Levels and Standards Framework for Surface Water, Ground Water, and Soils (ALF), provides the rationale and numeric action levels (ALs) for surface soil As stated in the ALF, ALs "are numeric levels that, when exceeded, trigger an evaluation, remedial action, and/or management action" (DOE et al 1996) Surface soil accelerated action remediation goals are equal to Tier I ALs unless protection of surface water requires a greater level of cleanup Subsurface soil accelerated action remediation goals are based on agreed-upon cleanup levels Although cleanup levels required to implement the final remedy will be determined in the CAD/ROD, it is anticipated that the accelerated action cleanup will be demonstrated to be protective in the CRA For the purpose of the ER RSOP, accelerated action remediation goals are based on RFCA ALs as modified by stewardship and As Low As Reasonably Achievable (ALARA) considerations Agreed-upon cleanup levels are cleanup levels negotiated by the RFCA Parties that may take the place of RFCA ALs

During the remediation process, personnel from the DOE Rocky Flats Field Office (RFFO), its contractor, Kaiser-Hill Company, L L C (K-H), CDPHE, and EPA will use the RFCA consultative process to establish and maintain effective working relationships with each other and with the general public

## **1.3 ER RSOP MODIFICATIONS**

This ER RSOP follows the RSOP approach outlined in RFCA and the Implementation Guidance Document (IGD) (DOE et al 1999) As this RSOP is implemented through Site closure, new information may require that the document be modified Modifications to this RSOP will be designated sequentially and placed in the Administrative Record (AR) and Appendix A of this document

## **1.4 ER RSOP NOTIFICATION**

DOE will notify the Lead Regulatory Agency (LRA) prior to implementing the ER RSOP. The Notification may address one or more IHSS Groups in accordance with prior agreement through the consultative process. The ER RSOP Notification will be submitted to the LRA, and to both LRAs if the Notification covers IHSS Groups in both the Industrial Area (IA) and Buffer Zone (BZ) Operable Units (OUs), for review at least 14 calendar days prior to the start of the accelerated action. For IHSS Groups with RCRA Units, the 30-day RCRA review period will begin when DOE informs the LRA through the consultative process that a RCRA Unit will be closed.

The LRA will approve or disapprove the Notification for each IHSS or IHSS Group addressed in the Notification within 14 calendar days after submittal. Any disapproval shall state, with specificity, the changes required to obtain LRA approval, and DOE may resubmit the Notification for 14 calendar day review and approval after making the changes. DOE may also invoke the dispute resolution process in accordance with RFCA, Part 15, Resolution of Disputes, Subpart B, for a disapproval or when the LRA fails to respond within 14 calendar days.

The Notification and LRA approval documentation will become part of the AR and be placed in Appendix B of this document.

The Notification consultative process will include the following activities:

- RFETS staff and the LRA will consult on what the Notification will include,
- RFETS staff will prepare the Notification for regulatory agency review, and
- RFETS staff and the regulatory agencies will attend a briefing to discuss and come to agreement on the Notification at the briefing.

The ER RSOP Notification will include the following:

- Map of IHSSs, PACs, and UBC sites that may require remediation,
- List of contaminants of concern (COCs),
- Basic project assumptions,
- Stewardship analysis,
- Accelerated action remediation goals,
- Treatment (if necessary),
- Project-specific monitoring (if any),
- RCRA units and intended RCRA waste disposition,

- List of documents making up the AR file for the individual project, and
- Projected schedule

The ER RSOP consultative process described in Section 2.1 is intended to provide the LRA with adequate information regarding the proposed accelerated action. It is anticipated that the LRA will participate in the day-to-day in-process characterization and remediation process to remain informed about sampling activities and results. Remediation maps will be developed within a day or two after characterization through the consultative process. Concurrence on when remediation is finished will be through the consultative process and documented through electronic mail or the Remedial Action Decision Management System (RADMS).



## **2.0 REGULATORY AND STAKEHOLDER INTERFACES**

DOE will use the consultative process to establish and maintain effective working relationships with the regulatory agencies and public throughout the accelerated action process. The consultative process, regulatory agency oversight roles, and public participation are discussed in the following sections.

### **2.1 RFCA CONSULTATIVE PROCESS**

The RFCA consultative process will be used throughout the ER RSOP remediation process during planning and at decision points. Figure 1 illustrates the overall remediation process and activities where regulatory agency consultation is expected. As shown on Figure 1, regulatory agencies will be part of the decision process starting with developing the overall remediation strategy and continuing through all decision-making phases. Regulatory agency consultation will occur during the following activities:

- Evaluation of existing characterization data,
- Location of characterization sampling points,
- Development of the Notification,
- Location of remediation areas and identification of COCs,
- Determination whether remediation objectives have been achieved, and
- Location of confirmation sampling locations

Because DOE and K-H will use the RFCA consultative process throughout the remediation process, opportunities for consultation are highlighted on activity, decision, and process flow diagrams throughout this RSOP.

The regulatory agencies will have access to project-specific data in the following formats:

- Soil Water Database (SWD) – The regulatory agencies have access to the sitewide environmental database through the Integrated Sitewide Environmental Data System (ISEDS)
- The Draft Buffer Zone Data Summary Report (DOE 2001a) and the Industrial Area Data Summary Report (DOE 2000b) – These reports contain all existing qualified data for the IA and BZ and are updated at least yearly
- RADMS (Section 12.1) – This system provides access to all characterization data, remediation data, and visualization and “what if scenario” tools at regulatory agency onsite RFETS offices. RADMS also provides data tables and maps to offsite regulatory agency offices.

RADMS will provide the regulatory agencies with access to characterization and remediation data at the same time the ER staff has access to the data. Additionally, the regulatory agencies will have the capability to query data, map data, and run statistical and geostatistical algorithms.

The use of RADMS at RFETS will facilitate full regulatory agency consultation on all decisions. Results of the characterization and remediation processes will be formalized in a Closeout Report for each IHSS Group. The Closeout Reports will be approved by the regulatory agencies.

## **2.2 REGULATORY OVERSIGHT**

ER RSOP activities have three phases: planning, implementation, and closeout. Each phase provides the opportunity for interaction between the regulatory agencies and DOE. Each phase has one or more RFCA decision points and additional checks and balances through which CDPHE and EPA will fulfill their regulatory oversight obligations. Decision points and additional checks and balances are briefly described below and summarized in Table 1.

### **2.2.1 Planning**

The key planning decision documents supporting the accelerated actions are the Industrial Area Sampling and Analysis Plan (IASAP) (DOE 2001b), the Draft Final Buffer Zone Sampling and Analysis Plan (BZSAP) (DOE 2002), and the ER RSOP. The IASAP and BZSAP guide all characterization required to support accelerated action activities under the ER RSOP. The sampling plans contain two key features, each with its own regulatory agency involvement and decision points. First, the sampling plans regard the IA and BZ as single projects and contain all data quality objectives (DQOs) and sampling methodologies to guide characterization of these areas through closure.

While the regulatory agencies' initial checkpoint is approval of these decision documents, the sampling plans contain a provision for formal modification if changes to DQOs or methodologies not addressed by the original plans are required. Modification of the plans requires agency approval.

Second, the sampling plans contain an Addendum element. The Addendum accommodates the Site's obligation to administratively disposition every IHSS, PAC and UBC site. It acts as a tracking vehicle over the period required to complete ER RSOP actions by identifying sites that will be characterized. The Addendum contains the target sites, site maps, site-specific PCOCs, existing qualified sampling data, starting-point sampling locations, and sampling methodology. The Addendum is prepared in consultation with the agencies and is subject to their approval. The first agency checkpoint in the ER RSOP process is approval of the Sampling and Analysis Plan (SAP) Addenda.

The second agency checkpoint in the ER RSOP process is approval of the ER RSOP itself, and the third checkpoint is the submittal of the ER RSOP Notification. The intent to invoke the RSOP is provided through a Notification issued by DOE to the regulatory agencies. The LRA will have 14 calendar days to approve the Notification (see Section 1.4).

**Table 1**  
**Regulatory Agency Oversight of ER RSOP Accelerated Actions**

PLANNING			
ACTIVITY	DESCRIPTION	AGENCY INTERFACE	AGENCY CHECKPOINT
Prepare IASAP and BZSAP	The SAPs are RFCA decision documents that describe the strategy, methods, and data quality requirements for characterizing contaminant release sites in soil at RFETS	<ul style="list-style-type: none"> <li>Continuous agency/DOE consultation throughout development of drafts and resolution of agency and public comments</li> <li>Consultation on document modification, if necessary</li> </ul>	<ul style="list-style-type: none"> <li>Approval of the IASAP and BZSAP</li> <li>Approval of modifications to the two documents</li> </ul>
Prepare SAP Addenda (annual and opportunity)	The addenda describe the release sites targeted for characterization during a fiscal year (FY) and when Site closure activities provide unanticipated characterization opportunities	<ul style="list-style-type: none"> <li>Consultation regarding target sites and sampling methods</li> </ul>	<ul style="list-style-type: none"> <li>Approval of the Addenda</li> </ul>
Prepare ER RSOP	The ER RSOP is a RFCA decision document for remediation of routine contaminant release sites in soil at RFETS	<ul style="list-style-type: none"> <li>Continuous agency/DOE consultation throughout development of drafts and resolution of agency and public comments</li> <li>Consultation on document modification, if necessary</li> </ul>	<ul style="list-style-type: none"> <li>Approval of the ER RSOP</li> <li>Approval of modifications to the document</li> </ul>
Prepare RSOP Notification (annual and opportunity)	The Notification is the RFCA-required declaration of intent by DOE to invoke the RSOP Notification will be made on an annual (FY) basis and when Site closure activities provide unanticipated remediation opportunities Release sites targeted in the Notification will match those in the corresponding sampling Addendum	<ul style="list-style-type: none"> <li>Consultation regarding target sites, work planning, and schedule</li> </ul>	<ul style="list-style-type: none"> <li>Approval of the Notification</li> </ul>

*Final Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation*

	ACTIVITY	DESCRIPTION	AGENCY INTERFACE	AGENCY CHECKPOINT
IMPLEMENTATION	Perform characterization and remediation	This activity consists of sampling target release sites as described in the approved Addendum and in accordance with IASAP and BZSAP methods and data requirements. Implementation tasks include defining the area of concern (AOC), excavating remediation areas, performing confirmation sampling, reviewing confirmation results, excavating more soil if needed, and backfilling the excavation.	<ul style="list-style-type: none"> <li>Continuous agency/DOE consultation during the sampling, data interpretation, excavation, and confirmation activities. Requires agency presence at RFETS and active participation in the day-to-day decision-making regarding shifts in sampling strategy, data sufficiency, and remediation stopping point.</li> </ul>	<ul style="list-style-type: none"> <li>Concurrence on remediation map</li> <li>Concurrence when remediation is complete</li> <li>Issuance of a Stop Work Order</li> </ul>
CLOSEOUT	Prepare Closeout Report	The Closeout Report is the RFCA decision document that describes the results of the remediation, including demarcation of the excavation, confirmation sampling results, and waste disposition.	<ul style="list-style-type: none"> <li>Review and comment on Draft Closeout Report</li> </ul>	<ul style="list-style-type: none"> <li>Approval of Closeout Report</li> </ul>

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The ER RSOP consultative process described in Section 2.1 is intended to provide the LRA with adequate information regarding the proposed accelerated action. The LRA will remain informed about sampling activities and results. Concurrence will be reached on remediation maps through the consultative process within a day or two after characterization. Concurrence on when remediation is finished will be through the consultative process and documented through electronic mail or RADMS.

As with the sampling plans, the ER RSOP contains a provision for modification. If, during implementation, it is determined that a substantive change to the RSOP is required for routine soil remediation, it will be modified accordingly. Modifications will follow the RFCA process, which addresses regulatory agency approval and public comment.

### **2.2.2 Implementation**

Characterization sampling is performed largely with portable field instruments, and the data are immediately translated into remediation maps to guide remediation crews. As sampling progresses, new data could indicate a needed shift in the sampling strategy. This could include taking more or fewer samples than anticipated or applying a different statistical analysis method. While a shift in approach would not necessarily require additional agency approval, the sampling plans are designed to accommodate real-time agency participation to ensure concurrence (Sections 2.1 and 12.1). Regulatory agency participation and concurrence on remediation targets are checkpoints, along with concurrence on when remediation is complete. Failure to reach concurrence on the completion of remediation will result in failure to approve the Closeout Report and, possibly, issuance of a stop work order.

### **2.2.3 Closeout**

The purpose of closeout is to document the accelerated action activities. The Closeout Report summarizes characterization data, the action taken, demarcation of excavation, confirmation sampling results, remediation waste volume and disposition, any changes in remediation approach and the rationale behind the change, near-term stewardship requirements and long-term stewardship recommendations, and the demarcation of residual contamination left in place on an IHSS or IHSS Group basis.

The Closeout Report is a RFCA decision document and the vehicle by which the regulatory agencies approve completion of the accelerated action. Until the agencies approve the Closeout Report, the accelerated action performed under the ER RSOP is not finished. Consequently, the Closeout Report not only serves as the RFCA-defined decision point, but as a checkpoint during the implementation phase. That is, DOE's interest is best served by achieving concurrence on the cleanup progress during implementation rather than at the end when resources have been re-directed to the next site.

## **2.3 PUBLIC PARTICIPATION**

Stakeholder input to the ER RSOP and the ER RSOP process is solicited and received through

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- The formal RFCA RSOP and Closeout Report review process, which incorporates the requirements of CERCLA and RCRA. Public comments on the Draft ER RSOP are provided in the Responsiveness Summary, located in Appendix C, and
- Public meetings, including
  - The Rocky Flats Citizens Advisory Board (RFCAB) meetings,
  - The Rocky Flats Water Working Group meetings,
  - The Rocky Flats Coalition of Local Governments (RFCLoG) meetings,
  - The Rocky Flats Cleanup Agreement Stakeholders Focus Group meetings, and
  - The ER/Decontamination & Decommissioning (D&D) Status Meetings

Monthly updates on the implementation of the ER RSOP will be provided at the ER/D&D Status Meetings or similar status meetings at a different time of day. It is anticipated that these updates will include the following information, as available:

- RSOP Notifications,
- RSOP Modifications,
- Characterization and remediation schedules,
- Status and results of ongoing IHSS Group characterizations,
- Remediation areas including COCs and extent of remediation,
- Stewardship and ALARA evaluations,
- Status and results of ongoing remediation activities, and
- Results of post-remediation confirmation sampling

Additionally, the ER staff will continue to provide information at specific stakeholder meetings, as requested.

Communication with stakeholders is also facilitated by use of the Internet. The Site Internet site ([www.rfets.gov](http://www.rfets.gov)) has a link to the Environmental Data Dynamic Information Exchange (EDDIE), which includes Site environmental information. The ER section contains current reports and information and will be updated as new information becomes available. The ER section will be updated with the following information specific to actions associated with the ER RSOP:

- IASAP and BZSAP Addenda,
- ER RSOP Notifications,
- Closeout Reports, and

- Annual IA Strategy Updates

Additionally, the web site contains information on upcoming public meetings, reports for public comment, and other environmental and decommissioning information

### **3.0 SITE DESCRIPTION**

RFETS is located approximately 16 miles northwest of Denver, Colorado, in northern Jefferson County. The Site occupies approximately 10 square miles. Boundaries and major features are illustrated on Figure 2. Most of the buildings are located within an industrial complex of approximately 350 acres (the IA) surrounded by a BZ of approximately 6,150 acres.

Materials defined as hazardous substances by CERCLA, as well as those defined as hazardous constituents by RCRA or the Colorado Hazardous Waste Act (CHWA), or as toxic substances as defined by the Toxic Substances Control Act (TSCA), may have been released to the environment at various locations across RFETS. Potential release sites covered under this RSOP are listed in Table 2.

PCOCs in soil and debris at these release sites vary, however, based on process knowledge and analytical data, PCOCs include radionuclides (plutonium ranging from background to 152,000 pCi/g), metals (sodium ranging from background to 30,800,000 mg/kg), VOCs (carbon tetrachloride ranging from nondetect to 690,000,000 µg/kg), and SVOCs (phenanthrene ranging from nondetect to 220,000 µg/kg).

Potential releases were identified at 194 IHSSs, PACs, UBC sites, and tanks in the IA, as illustrated on Figure 3. The IA contains 400 buildings, along with other structures, roads, and utilities, and is where the bulk of RFETS mission activities took place between 1951 and 1989 (DOE et al. 1996). Most of the buildings and associated structures were used for processing activities associated with weapons production. Descriptions of potential release sites are found in Appendix C of the IASAP (DOE 2001b). In the BZ, potential releases were identified at 42 IHSSs and PACs, as illustrated on Figure 4. The BZ contained support functions, disposal areas, and undisturbed buffer areas. Descriptions of historical operations in the BZ are presented in Appendix C of the Draft Final BZSAP (DOE 2002).

Descriptions of historical operations and releases in the IA and BZ are also presented in the Historical Release Report (HRR) (DOE 1992) and quarterly and annual updates (DOE 1993 through 2000).

Before RFCA went into effect, the IHSSs were grouped into 16 OUs as part of the Interagency Agreement (IAG). The OU consolidation prior to RFCA established the BZ and IA OUs and left the original OUs 1, 3, and 7 intact. OUs 5 and 6 remain in place with minor modifications. The 236 IHSSs, PACs, UBC sites, and associated tanks were further consolidated into 58 IA Groups (Figure 3) and 8 BZ Groups (Figure 4) as part of the 1999 IA Characterization and Remediation Strategy (IA Strategy) (DOE 1999a) and the Closure Project Baseline. Table 2 lists the pre-RFCA OUs, IHSSs, PACs, UBC sites, and tanks in the IA and BZ OUs. Descriptions of IHSSs, PACs, and UBC sites, based on previous studies, are included in the Final IASAP (DOE 2001b) and Draft Final BZSAP (DOE 2002).



**Table 2**  
**Potential Release Sites**

IHSS Group	Old Operable Unit No.	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
000-2	OU 9	IA	Original Process Waste Lines (OPWL)	000-121		Underground network pipes/tanks, multiple breaks and leaks
	OU 9	IA	Valve Vault West of Building 707	700-123 2	2,476	Process waste migration along containment pipe and into ditch
	N/A	IA	Building 123 Process Waste Line Break	100-602	14,514	Line valve vault, bedding material (conduit) between Buildings 123 and 443
	OU 9	IA	Tank 29 – OPWL	000-121		Aboveground waste process tank, possible leaks
	OU 9	IA	Tank 31 – OPWL	000-121		Below-grade, open-top sewage tank
	OU 9	IA	Low-Level Radioactive Waste Leak	700-127	2,500	Multiple line breaks and leaks
	OU 9	IA	Process Waste Line Leaks	700-147 1	16 427	Multiple line breaks and leaks, diverse release paths
	OU 14	IA	Radioactive Site 700 Area	700-162	141,294	Residual hot spots along 8th Street
000-3	N/A	IA	Sanitary Sewer System	000-500		Routine and incidental waste discharges to sinks, sumps, lines
	N/A	IA	Storm Drains	000-505		
	OU 6	IA	Old Outfall – Building 771	700-143	6 167	Contaminated waste water outfall area, one hot spot in nearby culvert
	OU 13	IA	Central Avenue Ditch Caustic Leak	000-190	186,016	Caustic release to Central Ave. Ditch, Walnut Creek, and B-1
000-4	N/A	IA	New Process Waste Lines (NPWL)	000-504		
100-1	N/A	IA	UBC 122 – Medical Facility	UBC 122	9,768	Drum leaks and possible line leaks
	OU 9	IA	Tank 1 – OPWL – Underground Stainless Steel Waste Storage Tank	000-121		Overflows and leaks from underground tank
100-2	N/A	IA	UBC 125 – Standards Laboratory	UBC 125	17,736	Possible spills from calibration lab (mercury)
100-3	N/A	IA	Building 111 Transformer polychlorinated biphenyl (PCB) Leak	100-607	356	Transformer leak
100-4	OU 13	IA	UBC 123 – Health Physics Laboratory	UBC 123	18,885	Disposal out windows and waste line leaks
	N/A	IA	Waste Leaks	100-148	14 143	Unlocated waste spills, OPWL leaks
	N/A	IA	Building 123 Scrubber Solution Spill	100-611	294	Process waste leak
100-5	N/A	IA	Building 121 Security Incinerator	100-609	599	Incinerator; accepted PCB-laden paper
300-1	OU 13	IA	Oil Burn Pit #1	300-128	914	Burn and airborne contamination area
	OU 13	IA	Lithium Metal Site	300-134(N)	7,126	Burn area
	OU 13	IA	Solvent Burning Grounds	300-171	11,412	Burn area
300-2	N/A	IA	UBC 331 – Maintenance	UBC 331	4,986	Possible spills from maintenance activities
	OU 13	IA	Lithium Metal Destruction Site	300-134(S)	23,728	Lithium burn areas (two)
300-3	N/A	IA	UBC 371 – Plutonium Recovery	UBC 371	114,147	Known spills of wastewater and process solutions
300-4	N/A	IA	UBC 374 – Waste Treatment Facility	UBC 374	27,131	Multiple spills and potential leaks from waste lines
300-5	OU 10	IA	Inactive D-836 Hazardous Waste Tank	300-206	627	Condensate water spill from line to tank
300-6	N/A	IA	Pesticide Shed	300-702	4,380	Herbicide/pesticide spills/leaks in shed and surrounding area

IHSS Group	Old Operable Unit No	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
400-1	N/A	IA	UBC 439 – Radiological Survey	UBC 439	5 107	Possible spills from machining operations
400-2	N/A	IA	UBC 440 – Modification Center	UBC 440	40 166	Possible spills from machining operations
400-3	N/A	IA	UBC 444 – Fabrication Facility	UBC 444	123 113	Overflows and leaks of process solutions
	N/A	IA	UBC 447 – Fabrication Facility	UBC 447	19 182	Possible spills and leaks from ongoing processes
	OU 12	IA	West Loading Dock Building 447	400-116 1	2 009	Spills and leaks impacting soil and groundwater beneath dock
	OU 12	IA	Cooling Tower Pond West of Building 444	400-136 1	7,654	Evaporation holding pond
	OU 12	IA	Cooling Tower Pond East of Building 444	400-136 2	7,097	Cooling tower blowdown pond
	OU 10	IA	Buildings 444/453 Drum Storage	400-182	3,465	Leaking drums and oil spills
	OU 10	IA	Inactive Building 444 Acid Dumpster	400-207	1,288	Known spills to containment berm (possible leakage)
	OU 10	IA	Inactive Buildings 444/447 Waste Storage Site	400-208	864	Possible leakage from drum storage
	N/A	IA	Transformer, Roof of Building 447	400-801	1,597	Transformer leakage via downspouts possibly to storm drain
	N/A	IA	Beryllium Fire – Building 444	400-810	15,073	Drainage, holding basin, and airborne contamination from fire
	OU 9	IA	Tank 4 – OPWL Process Waste Pits	000-121		Potential leaks and overflows
	OU 9	IA	Tank 5 – OPWL Process Waste Tanks	000-121		Potential leaks and overflows
	OU 9	IA	Tank 6 – OPWL Process Waste Floor Sump and Foundation Drain Floor	000-121		Potential leaks and overflows
	OU 12	IA	South Loading Dock Building 444	400-116 2	1,113	Windblown, drum leakage, dumping
400-4	N/A	IA	Miscellaneous Dumping Building 460 Storm Drain	400-803	18,932	Dumping to storm drain, extending along open ditch
	N/A	IA	Road North of Building 460	400-804	1,393	Hot spots from falling ingots covered w/asphalt
400-5	OU 10	IA	Sump #3 Acid Site (Southeast of Building 460)	400-205	1 693	Leakage from container overflows in berm area
	N/A	IA	RCRA Tank Leak in Building 460	400-813	356	Pipe leakage beneath building
	N/A	IA	RCRA Tank Leak in Building 460	400-815	356	Possible leakage from spills to secondary containment
400-6	OU 12	IA	Radioactive Site South Area	400-157.2	438,409	Dumping, surface runoff, air releases, open surface storage
400-7	N/A	IA	UBC 442 – Filter Test Facility	UBC 442	2,583	Leaking barrels, discharges
	OU 13	IA	Radioactive Site North Area	400-157 1	51,169	Leaking drums, drainage to ditches
	OU 10	IA	Building 443 Oil Leak	400-129	6,434	Leaks and spills from underground tanks (six)
	OU 12	IA	Sulfuric Acid Spill Building 443	400-187	20,206	Multiple leaks and sprays from storage tank
400-8	N/A	IA	UBC 441 – Office Building	UBC 441		
	OU 12	IA	Underground Concrete Tank	400-122		Overflows and leaking from tanks
	OU 9	IA	Tank 2 – Concrete Waste Storage Tank	000-121		Potential leaks and overflows
	OU 9	IA	Tank 3 – Concrete Waste and Steel Waste Storage Tanks	000-121		Potential leaks and overflows
400-10	N/A	IA	Sandblasting Area	400-807	9,583	Open air sandblasting

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IHSS Group	Old Operable Unit No	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
	OU 12	IA	Fiberglass Area West of Building 664	600-120 2	5 449	Multiple spills around work area (resin and solvents)
	OU 14	IA	Radioactive Site West of Building 664	600-161	53 346	Punctured and leaking drums, hydraulic leaks
	OU 13	IA	Valve Vaults 11 12 13	300-186	48 345	Leaks and discharges from transfer pipes and vaults
500-1	OU 16	IA	Scrap Metal Storage Site	500-197	89 320	Residual contamination from removal of process and building scrap
	OU 13	IA	North Site Chemical Storage Site	500-117 1	115 489	Surface storage of contaminated material, uranium chips
500-2	OU 13	IA	Radioactive Site Building 551	500-158	62,166	Wastebox leakage, exterior contaminated drums transferred
500-3	N/A	IA	UBC 559 - Service Analytical Laboratory	UBC 559	34,544	Plutonium waste line leaks and breaks
	N/A	IA	UBC 528 - Temporary Waste Holding Building	UBC 528	432	OPWL leaks/valve vault overflows
	OU 9	IA	Radioactive Site Building 559	500-159	5,363	Broken process waste lines
	OU 9	IA	Tank 7 - OPWL - Active Process Waste Pit	000-121		Potential leaks and overflows
	OU 9	IA	Tank 33 - OPWL - Process Waste Tank	000-121		Potential leaks and overflows
	OU 9	IA	Tank 34 - OPWL - Process Waste Tank	000-121		Potential leaks and overflows
	OU 9	IA	Tank 35 - OPWL - Building 561 Concrete Floor Sump	000-121		Potential leaks and overflows
500-4	OU 13	IA	Middle Site Chemical Storage	500-117 2	91,616	Minor leaks and spills, partial asphalt cover
500-5	N/A	IA	Transformer Leak - 558-1	500-904	356	PCB-oil leaks to concrete pad
500-6	N/A	IA	Asphalt Surface Near Building 559	500-906	356	1-gallon F001 spill from liquid hose transfer
500-7	N/A	IA	Tanker Truck Release of Hazardous Waste from Tank 231B	500-907	859	Liquid and solid sludge release to soil
600-1	N/A	IA	Temporary Waste Storage - Building 663	600-1001	42,803	Leaking, punctured, and spilled drums (concrete pad)
600-2	N/A	IA	Storage Shed South of Building 334	400-802	63 641	Leaking and spilled drums to concrete pad
600-3	OU 12	IA	Fiberglass Area North of Building 664	600-120 1	4,650	Multiple spills around work area
600-4	OU 14	IA	Radioactive Site Building 444 Parking Lot	600-160	143,752	Releases from drums and boxes stored on ground
600-5	N/A	IA	Central Avenue Ditch Cleaning	600-1004	14,885	Soil spreading from ditch to area around tanks
600-6	N/A	IA	Former Pesticide Storage Area	600-1005	356	Pesticide spills to dirt floor
700-1	N/A	IA	Identification of Diesel Fuel in Subsurface Soil	700-1115		Subsurface fuel leak
700-2	N/A	IA	UBC 707 - Plutonium Fabrication and Assembly	UBC 707	107,710	Process line leaks/breaks
	N/A	IA	UBC 731 - Building 707 Process Waste	UBC 731	4,000	Process spills/OPWL leaks and breaks
	OU 9	IA	Tank 11 - OPWL - Building 731	000-121		Potential leaks and overflows
	OU 9	IA	Tank 30 - OPWL - Building 731	000-121		Potential leaks and overflows
700-3	N/A	IA	UBC 776 - Original Plutonium Foundry	UBC 776	142,889	Airborne/tracked contamination fires and explosions/liquid waste spills

IHSS Group	Old Operable Unit No	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
	N/A	IA	UBC 777 – General Plutonium Research and Development	UBC 777		Process spills/OPWL leaks/fire contamination
	N/A	IA	UBC 778 – Plant Laundry Facility	UBC 778	26 609	Laundry water spills/OPWL leaks and breaks
	N/A	IA	UBC 701 – Waste Treatment Research and Development	UBC 701	5 645	Possible spills from Research and Development (R&D) laboratory
	OU 8	IA	Solvent Spills West of Building 730	700-118 1	246	Carbon tetrachloride overflows and line leaks
	OU 14	IA	Radioactive Site 700 Area No 1	700-131	7 072	Fire and explosion resulting in soil contamination
	OU 8	IA	Radioactive Site West of Buildings 771/776	700-150 2(S)	27,113	Airborne and tracked contamination from fire, cleanup and rain
	OU 8	IA	Radioactive Site South of Building 776	700-150 7	18 589	Airborne and tracked contamination from fire, cleanup, and rain
	N/A	IA	French Drain North of Buildings 776/777	700-1100	1,567	Possible pathway for contamination from explosion and fire
	OU 9	IA	Tank 9 – OPWL – Two 22,500-Gallon Concrete Laundry Tanks	000-121		Potential leaks and overflows
	OU 9	IA	Tank 10 – OPWL – Two 4,500-Gallon Process Waste Tanks	000-121		Potential leaks and overflows
	OU 9	IA	Tank 18 – OPWL – Concrete Laundry Waste Lift Sump	000-121		Potential leaks and overflows
	OU 8	IA	Solvent Spills North of Building 707	700-118 2	633	Tank leaks and rupture
	OU 8	IA	Sewer Line Overflow	700-144(N)	1,710	Pressurized sewer line breaks and overflows
	OU 8	IA	Sewer Line Overflow	700-144(S)	2,330	Pressurized sewer line breaks and overflows
	N/A	IA	Transformer Leak South of Building 776	700-1116	356	Dielectric fluid leak to pad, gravel, and soil
	OU 8	IA	Radioactive Site Northwest of Building 750	700-150 4	394	Leaks and backups of stored decontamination fluid
700-4	N/A	IA	UBC 771 – Plutonium and Americium Recovery Operations	UBC 771	97,553	Fire, sewer line breaks, process waste line leaks
	N/A	IA	UBC 774 – Liquid Process Waste Treatment	UBC 774	15,776	Tank overflows, drain breaks
	OU 8	IA	Radioactive Site West of Buildings 771/776	700-150 2(N)	27,113	Fire, explosion, tank overflows
	OU 8	IA	Radioactive Site 700 North of Building 774 (Area 3) Wash Area	700-163 1	18,613	Contaminated equipment wash area
	OU 8	IA	Radioactive Site 700 Area 3 Americium Slab	700-163.2	2,270	Buried contaminated Americium slab 8'x8'x10"
	OU 9	IA	Abandoned Sump Near Building 774 Unit 55 13 T-40	700-215	960	Mixed waste storage tank
	OU 8	IA	Hydroxide Tank, KOH, NaOH Condensate	700-139(N)(b)	342	Overflows/spills from aboveground KOH/NaOH tanks
	OU 9	IA	30,000-Gallon Tank (68)	700-124 1	1,133	Overflows/leaks from tank
	OU 9	IA	14,000-Gallon Tank (66)	700-124 2		Overflows/leaks from tank
	OU 9	IA	14 000-Gallon Tank (67)	700-124 3		Overflows/leaks from tank
	OU 9	IA	Holding Tank	700-125		Tank overflows
	OU 9	IA	Westernmost Out-of-Service Process Waste Tank	700-126 1	383	Below-grade leaks/overflows
	OU 9	IA	Easternmost Out-of-Service Process Waste Tank	700-126 2	370	Below-grade leaks/overflows
	OU 9	IA	Tank 8 – OPWL – East and West Process Tanks	000-121		Potential leaks and overflows

IHSS Group	Old Operable Unit No	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
	OU 9	IA	Tank 12 – OPWL – Two Abandoned 20 000-Gallon Underground Concrete Tanks	000-121		Potential leaks and overflows
	OU 9	IA	Tank 13 – OPWL – Abandoned Sump - 600 Gallons	000-121		Potential leaks and overflows
	OU 9	IA	Tank 14 – OPWL – 30 000-Gallon Concrete Underground Storage Tank (68)	000-121		Potential leaks and overflows
	OU 9	IA	Tank 15 – OPWL – Two 7 500-Gallon Process Waste Tanks (34W, 34E)	000-121		Potential leaks and overflows
	OU 9	IA	Tank 16 – OPWL – Two 30,000-Gallon Concrete Underground Storage Tanks (66 67)	000-121		Potential leaks and overflows
	OU 9	IA	Tank 17 – OPWL – Four Concrete Process Waste Tanks (30, 31, 32, 33)	000-121		Potential leaks and overflows
	OU 9	IA	Tank 36 – OPWL – Steel Carbon Tetrachloride Sump	000-121		Potential leaks and overflows
	OU 9	IA	Tank 37 – OPWL – Steel-Lined Concrete Sump	000-121		Potential leaks and overflows
	OU 8	IA	Caustic/Acid Spills Hydrofluoric Tank	700-139.2	918	Spills and leaks infiltrating surrounding soil
	OU 9	IA	Concrete Process 7,500-Gallon Waste Tank (31)	700-146 1	1,507	Frequent tank overflows and leakage
	OU 9	IA	Concrete Process 7,500-Gallon Waste Tank (32)	700-146 2		Frequent tank overflows and leakage
	OU 9	IA	Concrete Process 7,500-Gallon Waste Tank (34W)	700-146.3		Frequent tank overflows and leakage
	OU 9	IA	Concrete Process 7,500-Gallon Waste Tank (34E)	700-146 4		Frequent tank overflows and leakage
	OU 9	IA	Concrete Process 7,500-Gallon Waste Tank (30)	700-146 5		Frequent tank overflows and leakage
	OU 9	IA	Concrete Process 7,500-Gallon Waste Tank (33)	700-146 6		Frequent tank overflows and leakage
	OU 8	IA	Radioactive Site North of Building 771	700-150 1	24,779	Airborne, leaking drums, tracked contamination
	OU 8	IA	Radioactive Site Between Buildings 771 and 774	700-150.3	5,037	Broken process waste line
700-5	N/A	IA	UBC 770 – Waste Storage Facility	UBC 770	3,111	Possible leakage from stored waste containers
700-6	OU 8	IA	Buildings 712/713 Cooling Tower Blowdown	700-137	14,962	Ground placement of tower sludge/blowdown water leaks
	OU 8	IA	Caustic/Acid Spills Hydroxide Tank Area	700-139 1(S)	923	Multiple spills and leaks
700-7	N/A	IA	UBC 779 – Main Plutonium Components Production Facility	UBC 779	43,360	Building over original Solar Pond/water spills and leaks
	OU 8	IA	Building 779 Cooling Tower Blowdown	700-138	14,962	Underground cooling tower water line break
	OU 8	IA	Radioactive Site South of Building 779	700-150 6	4,435	Tracked contamination
	OU 8	IA	Radioactive Site Northeast of Building B779	700-150 8	13,054	Tracked contamination
	N/A	IA	Transformer Leak - 779-1/779-2	700-1105	712	PCB oil released from transformer

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IHSS Group	Old Operable Unit No	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
	OU 9	IA	Tank 19 – OPWL - Two 1,000-Gallon Concrete Sumps	000-121		Potential leaks and overflows
	OU 9	IA	Tank 20 – OPWL - Two 8 000-Gallon Concrete Sumps	000-121		Potential leaks and overflows
	OU 9	IA	Tank 38 – OPWL - 1 000 Gallon Steel Tanks	000-121		Potential leaks and overflows
700-8	OU 10	IA	750 Pad – Pondcrete/Saltcrete Storage	700-214	139 658	Pondcrete/saltcrete spills/pad runoff not contained
700-10	N/A	IA	Laundry Tank Overflow – Building 732	700-1101	1,856	Wastewater tank overflow
700-11	N/A	IA	Bowman's Pond	700-1108	4,741	Tanks/process line leaks/footing drain accumulation area
	OU 8	IA	Hydroxide Tank, KOH NaOH Condensate	700-139 1(N)(a)	2,520	Multiple spills and leaks
700-12	N/A	IA	Process Waste Spill – Portal 1	700-1106	356	Valve vault water spilled onto street
800-1	N/A	IA	UBC 865 – Materials Process Building	UBC 865	41 558	OPWL leaks/spills from coating ops and R&D activities
	N/A	IA	Building 866 Spills	800-1204	2,623	Vent pipe and tank overflows
	N/A	IA	Building 866 Sump Spill	800-1212	364	Leak from sump pump
	OU 9	IA	Tank 23 – OPWL	000-121		Potential leaks and overflows
800-2	N/A	IA	UBC 881 – Laboratory and Office	UBC 881	79,222	Multiple leaks/broken waste lines
	N/A	IA	Building 881, East Dock	800-1205	2,426	Possible unknown contamination/condensate spill
	OU 9	IA	Tank 24 – OPWL – Seven 2,700-Gallon Steel Process Waste Tanks	000-121		Potential leaks and overflows
	OU 9	IA	Tank 32 – OPWL – 131,160-Gallon Underground Concrete Secondary Containment Sump	000-121		Potential leaks and overflows
	OU 9	IA	Tank 39 – OPWL – Four 250-Gallon Steel Process Waste Tanks	000-121		Potential leaks and overflows
800-3	N/A	IA	UBC 883 – Roll and Form Building	UBC 883	49 325	Process waste water leaks and overflows
	N/A	IA	Valve Vault 2	800-1200	4,541	Transfer line leak
	OU 9	IA	Tank 25 – OPWL – 750-Gallon Steel Tanks (18 19)	000-121		Potential leaks and overflows
	OU 9	IA	Tank 26 – OPWL – 750-Gallon Steel Tanks (24 25, 26)	000-121		Potential leaks and overflows
	N/A	IA	Radioactive Site South of Building 883	800-1201	1,500	Multiple areas of contamination from Plant operations
800-4	N/A	IA	UBC 886 – Critical Mass Laboratory	UBC 886	13 517	Leaks and spills from criticality experiments
	OU 9	IA	Tank 21 – OPWL – 250-Gallon Concrete Sump	000-121		Potential leaks and overflows
	OU 9	IA	Tank 22 – OPWL – Two 250-Gallon Steel Tanks	000-121		Potential leaks and overflows
	OU 9	IA	Tank 27 – OPWL – 500-Gallon Portable Steel Tank	000-121	31,400	Potential leaks and overflows
	OU 14	IA	Radioactive Site #2 800 Area, Building 886 Spill	800-164 2	31 400	Tank leak
800-5	N/A	IA	UBC 887 – Process and Sanitary Waste Tanks	UBC 887	378	Leaks and breaks in process waste lines
	OU 10	IA	Building 885 Drum Storage	800-177	1,064	Possible releases from waste storage

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IHSS Group	Old Operable Unit No	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
800-6	N/A	IA	UBC 889 – Decontamination and Waste Reduction	UBC 889	2,603	Radiological car wash area/OPWL leaks/waste tank breaches
	OU 14	IA	Radioactive Site 800 Area Site #2 Building 889 Storage Pad	800-164 3	28,944	Leaks/spills/rainwater transport from storage area
	OU 9	IA	Tank 28 – Two 1 000-Gallon Concrete Sumps	000 121		Potential leaks and overflows
	OU 9	IA	Tank 40 – Two 400-Gallon Underground Concrete Tanks	000-121		Potential leaks and overflows
900-1	N/A	IA	UBC 991 – Weapons Assembly and R&D	UBC 991	59,849	Potential line leaks/valve vault breaches and overflows
	OU 8	IA	Radioactive Site Building 991	900-173	5,970	Small spills and equipment wash area
	OU 8	IA	Radioactive Site 991 Steam Cleaning Area	900-184	4,125	Equipment cleaning area
	N/A	IA	Building 991 Enclosed Area	900-1301	3,939	Possible leaks from waste containers/material storage
900-2	OU 2	BZ	Oil Burn Pit No 2	900-153	6,403	Oil contaminated with uranium was burned in two parallel trenches
	OU 2	BZ	Pallet Burn Site	900-154	3,152	Wooden pallet burn area
900-3	OU 10	IA	904 Pad Pondcrete Storage	900-213	127,334	Spillage and rainwater runoff of stored pondcrete/saltcrete
900-4&5	OU 10	IA	S&W Building 980 Contractor Storage Facility	900-175	5,819	Leaks and spills from drum storage
	N/A	IA	Gasoline Spill Outside Building 980	900-1308	356	Gas overflow during filling
900-11	OU 2	BZ	903 Pad	900-112	146,727	Leaks and spills from drum storage
	OU 2	BZ	Hazardous Disposal Area	900-140	65,498	Reactive metal destruction and disposal site
	OU 2	BZ	East Firing Range	SE-1602	465,173	Dispersal of lead and depleted uranium from routine weapons firing
NE/NW	OU 10	BZ	Property Utilization and Disposal (PU&D) Yard – Drum Storage	174a	4,342	Leaks and spills from RCRA drum storage
	N/A	BZ	OU 2 Treatment Facility	NE-1407	356	Leaks and spills from process operations
	N/A	BZ	Trench T-12 Located at OU 2 East Trenches	NE-1412	7,449	Disposal of sanitary waste sludge and flattened drums
	N/A	BZ	Trench T-13 Located at OU 2 East Trenches	NE-1413	5,090	Disposal of sanitary waste sludge and flattened drums
	N/A	BZ	North Firing Range	NW-1505	117,748	Currently in use
NE-1	OU 6	OU 6	Pond A-1	142 1	39,294	Received wastewater effluent from the IA spill control
	OU 5	OU 6	Pond C-2	142 11	168,524	Received discharge from the South Interceptor Ditch (SID)
	OU 6	OU 6	Pond A-2	142 2	61,373	Received wastewater effluent from the IA spill control
	OU 6	OU 6	Pond A-3	142 3	122,909	Received wastewater effluent from the IA
	OU 6	OU 6	Pond A-4	142 4	254,102	Received wastewater effluent from the IA
	OU 6	OU 6	Pond A-5	142 12	12,256	Received wastewater effluent from the IA
	OU 6	OU 6	Pond B-1	142 5	11,396	Flow-through retention pond, received treated sanitary effluent and process waste

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IHSS Group	Old Operable Unit No	Current Operable Unit	Description	IHSS/PAC/UBC Site	Area (ft <sup>2</sup> )	Historical Notes
	OU 6	OU 6	Pond B-2	142 6	33 761	Flow-through retention pond, received treated sanitary effluent and process waste
	OU 6	OU 6	Pond B-3	142 7	18 422	Flow-through retention pond, received treated sanitary wastewater effluent discharge
	OU 6	OU 6	Pond B-4	142 8	11 731	Flow through retention pond received treated sanitary effluent and process waste
	OU 6	OU 6	Pond B-5	142 9	129,515	Flow-through retention pond, received treated sanitary effluent and process waste
	OU 5	OU 5	Pond C-1	142 1	39 294	Retention and monitoring pond received sanitary sewage discharge and runoff from the 903 Pad Area
NE-2	OU 2	BZ	Trench T-7	111 4	15,565	Disposal of sanitary waste sludge
SW-1	OU 5	OU 5	Ash Pit 1	133 1	13,960	Disposal of combustible waste ash and noncombustible trash
	OU 5	OU 5	Ash Pit 2	133 2	26 624	Disposal of combustible waste ash and noncombustible trash
	OU 5	OU 5	Ash Pit 4	133 4	10,749	Disposal of combustible waste ash and noncombustible trash
	OU 5	OU 5	Concrete Wash Pad	133 6	35,274	Deposition of potentially contaminated ash
	N/A	BZ	Recently identified ash pit (also referred to as TDEM-2)	SW-1702	5,588	Disposal of combustible waste ash, depleted uranium and metallic debris
	OU 2	BZ	Ryan's Pit (Trench 2)	109	261	Disposal of VOCs and drum carcasses



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**Final Environmental Restoration  
RSOP for Routine Soil Remediation  
January 2002**

**Figure 3:  
Industrial Area Groups**

**September 10, 2001**

**Map ID: 01-0698**

**CERCLA Administrative Record document, SW - A - 004453**

**U S DEPARTEMENT OF ENERGY  
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE**

**GOLDEN, COLORADO**

**THIS TARGET SHEET REPRESENTS AN  
OVER-SIZED MAP / PLATE FOR THIS  
DOCUMENT**

**Final Environmental Restoration  
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**Figure 4:  
Buffer Zone IHSS & PACs**

**July 3, 2001**

**Map ID: 01-0267**

**CERCLA Administrative Record document, SW - A - 004453**

**U S DEPARTEMENT OF ENERGY  
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE**

**GOLDEN, COLORADO**

SW-A-004453

### **3.1 PREVIOUS STUDIES AND REMEDIAL ACTIONS**

Numerous studies conducted at RFETS include RCRA Facility Investigation/Remedial Investigations (RFI/RI), risk assessments, Interim Measure/Interim Remedial Actions (IM/IRAs), and Corrective Measure Studies/Feasibility Studies (CMS/FSs). Previous studies in the IA include RFI/RI studies initiated at all previous IA OUs, Phase I and Phase II RFI/RI and an IM/IRA at OU 4 (Solar Evaporation Ponds [SEP]), and a preremedial investigation at Bowman's Pond. Previous studies in the BZ include RFI/RI at OU 1 (881 Hillside), OU 2 (903 Pad, Mound, and East Trenches), OU 5 (Woman Creek), OU 6 (Walnut Creek), OU 7 (Present Landfill), and OU 11 (West Spray Field). Remedial actions were conducted at Trenches T-1, T-2, T-3, and T-4, the Mound Site, and Ryan's Pit in the BZ, and polychlorinated biphenyl (PCB) sites in the IA.

### **3.2 GEOLOGY**

At RFETS, relatively flat-lying Quaternary surficial deposits overlie Cretaceous bedrock. The surficial deposits consist primarily of the Rocky Flats Alluvium and artificial fill materials (EG&G 1992). The alluvium ranges from approximately 100 feet (ft) thick at the western edge of the Site to approximately 1 ft thick at the eastern edge of the Site, and consists of unconsolidated, poorly sorted coarse gravels, coarse sands, and gravelly clays with discontinuous lenses of clay, silt, and sand. The Rocky Flats Alluvium is truncated by erosion immediately east of the IA.

The alluvium unconformably overlies weathered claystone bedrock consisting of the Upper Cretaceous Arapahoe and Laramie Formations. The Arapahoe Formation ranges from 0 to approximately 50 ft thick and consists of siltstones and claystones with sandstone lenses. In some areas, such as near the SEP, well-sorted and coarse-grained sandstone is present. This sandstone provides a preferential migration pathway, however, it is interrupted by erosion and does not provide an offsite pathway for groundwater and contaminant migration. The Laramie Formation unconformably underlies the Arapahoe Formation. Beneath the Site, the Laramie Formation is 600 to 800 ft thick and consists primarily of claystone with siltstone, fine-grained sandstone and coal lenses are also present (EG&G 1995a).

### **3.3 SURFACE WATER HYDROLOGY**

Three intermittent streams drain RFETS: Rock Creek, Walnut Creek, and Woman Creek. The northwestern corner of RFETS is drained by Rock Creek, which flows northeast through the BZ to its offsite confluence with Coal Creek. North and South Walnut Creeks and an unnamed tributary drain the northern part of the Site. The confluence of North and South Walnut Creeks is east of Ponds A-4 and B-5. The South Interceptor Ditch (SID), located between the IA and Woman Creek, collects runoff from the southern part of RFETS and ultimately diverts the water to Pond C-2. Water from the A-, B-, and C-series ponds is monitored and discharged periodically. Woman Creek is diverted over the SID, flows around Pond C-2, and then flows offsite into the Woman Creek Reservoir.

### **3.4 HYDROGEOLOGY**

Two hydrostratigraphic units are present at RFETS the upper hydrostratigraphic unit (UHSU) and the lower hydrostratigraphic unit (LHSU) The UHSU consists of the unconfined saturated Rocky Flats Alluvium and weathered Arapahoe and Laramie Formation bedrock This hydrostratigraphic unit contains most of the groundwater impacted by Site activities The LHSU consists of the unweathered Arapahoe and Laramie Formations Claystones and silty claystones in this unit act as an aquitard, inhibiting downward groundwater movement The geometric mean of measured hydraulic conductivity values in the Rocky Flats Alluvium is approximately  $10^{-4}$  centimeter per second (cm/sec) LHSU conductivities are generally lower than those of the overlying UHSU because of the higher percentage of fine-grained material (EG&G 1995b)

Groundwater within the UHSU primarily flows west to east along the bedrock contact with the underlying Arapahoe and Laramie Formation claystones Groundwater elevations are highest in the spring and early summer when precipitation is high and evapotranspiration is low Groundwater elevations decline during the remainder of the year, and some areas of the UHSU are seasonally dry Groundwater from the UHSU discharges at springs and seeps on the hillsides at the contact between the alluvium and bedrock, and where sandstone lenses subcrop in drainages, and does not migrate offsite (EG&G 1995b)

To the west, where the alluvium is thickest, depth to the water table is 50 to 70 ft below ground surface (bgs) Depth to water generally decreases from west to east as the surficial material thins Depth to water ranges from less than 2 ft to 22 ft (EG&G 1995b) Engineered structures cause variations in water levels and saturated thickness The impact of building footing drains, utility corridors, and other structures has not been evaluated, however, these structures are believed to impact groundwater flow and are being evaluated as part of the Site-Wide Water Balance (SWWB)

The majority of remediation activities will be conducted in Rocky Flats Alluvium However, basements of some buildings extend into the weathered Arapahoe or Laramie Formations Because of the deep basements, UHSU groundwater may be intercepted beneath some buildings

### **3.5 FUTURE LAND USE**

Future Site land use assumptions are consistent with Figure 1 from RFCA Attachment 5 RFCA ALs for these land use scenarios will be applied

## **4.0 INTERFACES**

Because this ER RSOP covers projects across the Site, implementation requires interaction with Site organizations performing many functions. These activities are not remediation activities under this RSOP but are interface points. Some activities could be covered under other decision documents. Key interfaces are described below and illustrated on Figure 5.

### **4.1 DECOMMISSIONING**

The decommissioning staff is responsible for dismantling Site structures and infrastructure. ER staff will work closely with decommissioning staff so remediation projects can be scheduled and resources can be managed effectively. Additionally, information from decommissioning activities will be used during remediation planning and implementation.

Approximately 90 percent of the potentially contaminated sites that may require soil remediation are associated with buildings or supporting infrastructure. Consequently, close interaction with decommissioning staff will be required.

ER will work with decommissioning staff to achieve an integrated process to minimize risk to workers and the environment, minimize generation of remediation waste, streamline technical processes, and reduce project costs. Project interface points and division of responsibilities include the following:

- The ER characterization and remediation schedule is integrated with decommissioning schedules. In general, ER characterization will start during facility deactivation or decommissioning.
- Decommissioning staff will remove any structural material to 3 ft below existing grade including facility slabs, foundations, and at least the top 3 ft of the footings/pilings.
- Decommissioning staff will remove any structures below 3 ft of the existing grade when the structure prevents access to underlying soil that requires remediation or when the structure cannot be released for unrestricted use. The removal will include the surface foundation. Any remaining footings/pilings will be assessed and may be removed during ER activities.
- Decommissioning staff will flush and remove sanitary sewer lines, tanks, and equipment associated with facilities to the isolation valve of the main system line. Clean water will be used for flushing.
- If ER staff encounters additional UBC after decommissioning staff removes contaminated structures below 3 ft of proposed final grade, ER staff will remove the additional structure as necessary to complete the remediation.
- In the event that decommissioning of a facility with a high potential for UBC occurs well before scheduled soil remediation actions, ER staff may specify that facility slabs be left in place to provide continued containment of potentially contaminated soil. This decision will

be made on a case-by-case basis in consultation with the LRA, documented in writing with concurrence from both groups, and included in the project AR. The requirements for leaving a slab in place will be addressed by ER staff.

- If slab removal is delayed, the Site's landlord staff will provide surveillance and maintenance of the facility slab during the interim. The handoff from decommissioning to the landlord organization will be documented in writing between decommissioning, ER, and the landlord organizations.
- Tunnels and other underground structures will be dispositioned on a case-by-case basis. In general, the dispositioning will be conducted during decommissioning. The decision on the disposition of these structures will be identified in project management plans and RFCA decision documents.
- Foundation drains will be removed, grouted, or otherwise disrupted by ER staff to eliminate potential contaminant migration pathways. If foundation drains are disturbed during decommissioning, they will be removed.
- ER staff will assess and be responsible for determining the actions for remediating contaminated soil and associated process waste lines beneath floor slabs.
- If decommissioning occurs in an IHSS area, a silt fence or other sediment control mechanism will be used, where needed, so potential contamination does not migrate outside of the IHSS area. ER staff will address sediments that collect at the sediment control point during remediation of the associated IHSS.
- Decommissioning staff will remove all electrical and water utilities within the facility footprint. Underground utilities will be left in a stable condition outside the facility footprint, and a map will be maintained annotating the locations and sources of these utilities. The maps will be maintained in the AR and project files and provided to ER staff.
- Decommissioning staff will remove process waste lines, tanks, and any other lines associated with the process waste transfer system within or as part of the facility footprint. Decommissioning will cap off the process waste lines at the facility perimeter or closest junction, as appropriate. A map annotating the locations and sources of the process lines will be maintained in the AR and project files and provided to ER staff.
- Decommissioning staff will remove valve vaults. ER staff will characterize soil surrounding valve vaults and remediate as necessary.
- ER staff will work with the building engineers and planners to identify potential spills and leaks, process waste lines, and other areas of potential contamination beneath the buildings.
- The Building 374 treatment facility will be closed and replaced with an alternate waste treatment system. Based on the facility transition date, liquids generated during ER remediation activities may be treated in Building 374, the alternate waste treatment system, Building 891, or Sewage Treatment Plant.

## **4.2 COMPLIANCE**

The RFETS compliance organizations are responsible for guiding and supporting Site regulatory strategy and compliance. ER staff will work with compliance staff to ensure remediation is compliant with RFCA and identified Applicable or Relevant and Appropriate Requirements (ARARs). Remediation of RCRA units will be coordinated with compliance staff to ensure data generated during ER remediation activities are available for the closure of RCRA units.

### **4.2.1 RCRA Compliance**

Compliance staff is responsible for ensuring Site activities are in accordance with RCRA requirements. Part of this responsibility includes overseeing the closure of RCRA-regulated units. Because ER staff will be responsible or partly responsible for the closure of some RCRA units, interaction and data transfer between ER and compliance organizations is critical. Project interface points and division of responsibilities include the following:

- ER staff will consult with compliance staff on the location and status of RCRA-regulated units.
- ER staff will remediate RCRA-regulated ER units in accordance with Section 6.5.3 of this RSOP.
- ER staff will document the RCRA closure activities, for those units that ER remediates, in RADMS.
- ER staff will document remediation activities in the Closeout Report. Compliance staff will use this information to update the RCRA permit and the Master List of RCRA Units.

### **4.2.2 Environmental Monitoring**

The IMP (DOE 2000a) provides a template for routine data collection for groundwater, soil, surface water, air, and ecology in the IA and BZ and around decommissioning and remediation projects. Interaction and data transfer between the compliance and ER organizations is ongoing. Project interface points and division of responsibilities include the following:

- ER staff will consult with compliance staff on the location of surface water, groundwater plumes, and ecological resources during project planning to develop protection requirements.
- ER staff will inform compliance staff when and where remediation actions are planned. This information will be used in planning project-specific surface water, groundwater, and air monitoring activities. The compliance staff will write SAPs to direct project-specific monitoring in accordance with the IMP.
- ER staff will notify compliance staff when surface water, groundwater, or ecological resources are encountered at a project site.
- ER staff will provide compliance staff with a yearly summary of stewardship recommendations based on completed accelerated actions.



### **4.3 WASTE MANAGEMENT**

The RFETS waste management organization is responsible for Site waste management activities. ER staff will work closely with waste management staff on waste characterization and transportation issues. Of critical importance is the ability to move ER remediation waste from the remediated area. Additionally, ER staff will work with waste management staff to remove packaged waste currently located in waste storage facilities within IHSS and PAC boundaries. Project interface points and division of responsibilities include the following:

- ER staff will inform waste management staff of upcoming projects, potential waste types, and volumes prior to the start of remediation projects
- The waste management organization will assign a Waste Requirements Representative (WRR) who will be responsible for providing waste management guidance and assistance to the project
- The WRR will issue a Waste Generating Instruction (WGI) for all waste streams that identifies waste characteristics, U.S. Department of Transportation (DOT) packaging and label requirements, waste packing instructions, characterization requirements for treatment and disposal, and document requirements
- ER staff will be responsible for waste characterization, segregation, and packaging
- The WRR will verify that packaged waste meets WGI requirements and has been entered into the Waste and Environmental Management System (WEMS) before the waste is transferred to the waste management organization
- Waste management staff will be responsible for storage, transportation, and disposal of ER remediation waste

### **4.4 SITE SERVICES**

A key Site function is provided by the site services organization that is responsible for all Site systems. ER staff relies on the site services organization for a number of support functions. Project interface points and division of responsibilities include the following:

- ER staff will consult with site services staff before excavation to determine whether utilities are present in the excavation area
- Site services staff will continue to provide fire, emergency, road, and maintenance support services through closure
- Site services staff will cap or seal and abandon in place underground water distribution systems deeper than 3 ft below grade
- Site services staff will close the water utility system. If the system is closed before ER remediation is complete, ER staff will be required to provide water for dust suppression, decontamination, and other uses

- Site services staff will remove all manholes
- Site services staff will close the electrical power system. Power poles will be cut off at grade. After the power system is shut down, ER staff will be required to provide generators for power requirements.
- Site services staff will close the Sewage Treatment Plant (STP) and associated sanitary sewer lines. The STP and associated sewer lines will be flushed in accordance with the RSOP for Facility Disposition (DOE 2000c). ER staff will characterize soil surrounding the sewer lines, remediate contaminated soil as necessary, flush contaminated pipe, and foam or grout pipelines deeper than 3 ft below grade.
- Storm drains will be maintained through the end of FY05 (approximately). Some components of the clean storm drain system may be maintained or modified as part of long-term stewardship needs after Site closure. ER staff will characterize soil around the remaining storm drains and remediate as necessary. Contaminated storm drains will be removed. Storm drains deeper than 3 ft below grade will be foamed or grouted and abandoned in place.

## **5.0 ACCELERATED ACTION DECISIONS**

Accelerated action decisions will be made based on remedial action objectives (RAOs), evaluation of characterization and existing analytical data in accordance with Draft Final BZSAP (DOE 2002) and IASAP (DOE 2001b) DQOs, and ALARA and stewardship considerations. The ER RSOP accelerated action decision framework is shown on Figure 6. These decision criteria are discussed below and illustrated in figures throughout this section. Because ARARs are considered during accelerated actions and are used, in part, to determine RAOs, they are included with RAOs in Section 5.1.

### **5.1 LONG-TERM REMEDIAL ACTION OBJECTIVES**

RAOs are contaminant- and medium-specific goals designed to protect human health and the environment and are used to guide the accelerated actions. The overall long-term RAOs for RFETS soil are as follows:

- 1 Provide a remedy consistent with the RFETS goal of protection of human health and the environment,
- 2 Provide a remedy that minimizes the need for long-term maintenance and institutional or engineering controls, and
- 3 Minimize the spread of contaminants during implementation of accelerated actions.

#### **5.1.1 Surface Soil**

The amount and quality of characterization information for the IHSSs, PACs, and UBC sites that will be addressed through actions taken under this RSOP vary greatly. The COCs, range of contamination, and types of debris expected in contaminated soil are discussed in previous sections of this RSOP and in the reference documents listed in Section 15.0. Characterization information is based on existing characterization data, including sampling, process knowledge, and waste stream characterization, and on contaminants encountered and successfully removed in previous soil removal accelerated actions, including those removed through low-temperature thermal desorption at other IHSSs in the last 5 years. RAOs are developed to address categories of anticipated COCs (radionuclides, organics, and metals). Based on COCs and potential exposure pathways for surface soil, surface soil RAOs include the following:

- 1 Prevent human exposure (direct contact, ingestion, and inhalation) to contaminated surface soil that exceeds RFCA Tier I ALs or agreed-upon cleanup levels,
- 2 Protect surface water quality, and
- 3 Protect ecological resources during remediation while not adversely impacting other ecological resources.

The final action for the Site, which will be described in the final CAD/ROD, will provide for long-term protection of human health and the environment, address remaining threats posed by the Site, and protect surface water and ecological resources

### **5.1.2 Subsurface Soil**

The amount and quality of characterization information for the IHSSs, PACs, and UBC sites that will be addressed through actions taken under this RSOP vary greatly. The COCs, range of contamination, and types of debris expected in contaminated soil are discussed in previous sections of this RSOP and in the reference documents listed in Section 15.0. Characterization information is based on existing characterization data, including sampling, process knowledge, and waste stream characterization, and on contaminants encountered and successfully removed in previous soil removal accelerated actions, including those removed through low-temperature thermal desorption at other IHSSs in the last 5 years. RAOs are developed to address categories of anticipated COCs (radionuclides, organics, and metals). Subsurface soil will be remediated to agreed-upon cleanup levels. Based on the overall goal, COCs, and potential exposure pathways, subsurface soil RAOs are

- 1 Prevent adverse effects to surface water quality resulting from the subsurface soil-to-groundwater-to-surface water contaminant migration pathway,
- 2 Remediate soil containing COCs above agreed-upon cleanup levels from 6 inches bgs generally to the top of the saturated zone or top of bedrock, as appropriate, to address the extent of contamination, and
- 3 Protect ecological resources during remediation while not adversely impacting other ecological resources

The final action for the Site, which will be described in the final CAD/ROD, will provide for long-term protection of human health and the environment, address remaining threats posed by the Site, and protect surface water and ecological resources

### **5.1.3 Applicable or Relevant and Appropriate Requirements**

RFCA is a CHWA corrective action order and a CERCLA Section 120 interagency agreement. Under RFCA paragraph 25d, the approved ER RSOP becomes part of RFCA and therefore part of the CHWA corrective action order. This ER RSOP does not change any provision of the body of RFCA. Actions under this ER RSOP occurring in the IA in response to releases of hazardous wastes or hazardous constituents (including soil or other media that contains hazardous wastes or constituents, or debris contaminated with hazardous wastes or constituents), and to close interim status or permitted units are regulated under CHWA authority as provided in RFCA, rather than under CERCLA authority. This ER RSOP, and CDPHE decisions pursuant to it, provide the administrative means for implementing CHWA authority. Pursuant to RFCA paragraph 97 and Section X of the RFETS CHWA permit, the ER RSOP also functions as a modification to the Site's closure plan for regulated units addressed in the ER RSOP. And pursuant to Section 6.5.3 of this ER RSOP, the ER RSOP Notification functions as the closure description document for

units closed under this ER RSOP Refer to RFCA Parts 8 and 9, and in particular paragraphs 13d, 68, and 96 -105

To the extent the foregoing actions under this ER RSOP occurring in the IA address hazardous wastes or hazardous constituents, relevant CHWA regulations apply to those actions taken under this ER RSOP, and are not CERCLA ARARs Other actions under this ER RSOP, i e , those that address radionuclides or other hazardous substances that are not hazardous wastes or constituents, as well as all actions that occur in the BZ (because such actions would be regulated under CERCLA authority) must attain, to the maximum extent practicable, federal and state ARARs listed in Table 3

Wastes generated by activities under this ER RSOP are remediation wastes as defined in RFCA paragraph 25 bf

**Table 3**  
**Applicable or Relevant and Appropriate Requirements**

Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
<b>Colorado Air Quality Control Commission (CAQCC) Regulations</b>	5 Code of Colorado Regulations (CCR) 1001		X	X
<ul style="list-style-type: none"> <li>Emission Control Regulations for Particulates, Smoke, Carbon Monoxide, and Sulfur Oxides                             <ul style="list-style-type: none"> <li>Opacity</li> </ul> </li> </ul>	5 CCR 1001-3  Section II A 1	The Site will not allow the emission into the atmosphere of any air pollutant that is in excess of 20 percent opacity from covered sources Certified visible emissions evaluators will be available to ensure compliance		
<ul style="list-style-type: none"> <li>Fugitive Particulate Emissions</li> <li>Construction Activities</li> <li>Storage and Handling of Materials</li> <li>Haul Roads</li> <li>Haul Trucks</li> </ul>	Section III D Section III D 2(b) Section III D 2(c)  Section III D 2(e) Section III D 2(f)	Use a combination of dust control measures (Section 7 0) that may include covering loads, speed reduction, water sprays, road cleaning, covering or stabilization of spoil piles, and ceasing work at certain wind speeds	X	X
<ul style="list-style-type: none"> <li>Air Pollutant Emission Notice (APEN)</li> </ul>	5 CCR 1001-5, Part A	APENs will be submitted as appropriate in accordance with RFCA Fuel consumption limits for fuel-fired equipment will be followed	X	X

Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
<ul style="list-style-type: none"> <li>Construction Permits</li> </ul>	5 CCR 1001-5, Part B	Construction permits are not required, however, requirements such as fuel consumption limits for fuel-fired equipment will be followed	X	X
<ul style="list-style-type: none"> <li>Emissions of VOCs                             <ul style="list-style-type: none"> <li>Transfers of VOCs</li> </ul> </li> </ul>	5 CCR 1001-9 Regulation Number 3	Use submerged fill or bottom filling equipment when transferring VOCs to any tank, container, or vehicle compartment with a capacity exceeding 56 gallons	X	X
<ul style="list-style-type: none"> <li>Disposal of VOCs                             <ul style="list-style-type: none"> <li>Construction Permit Requirements</li> </ul> </li> </ul>	5 CCR 1001-9 Regulation Number 3 Section V	VOCs will not be disposed by evaporation or spillage unless reasonably available control technologies (RACTs) are utilized	X	X
<b>National Emission Standards for Hazardous Air Pollutants (NESHAP)</b> <ul style="list-style-type: none"> <li>National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities                             <ul style="list-style-type: none"> <li>Standard</li> </ul> </li> </ul>	40 Code of Federal Regulations (CFR) 61, subpart H  61 92	The Site Radioactive Ambient Air Monitoring Program (RAAMP) sampling network is used to verify compliance with the 10 millirems per year (mrem/yr) standard	X	X
<ul style="list-style-type: none"> <li>Emission Monitoring and Test Procedures</li> </ul>	61 93	Radionuclide emission measurements will be made at all release points that have a potential to discharge radionuclides into the air that could cause an effective dose equivalent (EDE) to the most impacted member of the public in excess of 1 percent of the standard (0.1 mrem/yr)	X	X
<ul style="list-style-type: none"> <li>Compliance and Reporting</li> </ul>	61 96	Site personnel perform radionuclide air emission assessments on all new and modified sources Appropriate notifications are submitted for sources with calculated controlled emissions that exceed 0.1 mrem/yr EDE	X	X

Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
<b>Federal Water Pollution Control Act (FWPCA), Clean Water Act (CWA), Colorado Basic Standards and Methodologies for Surface Water</b>	5 CCR 1002-31	Surface water quality will be monitored in accordance with RFCA Attachment 5 requirements	X	X
<b>National Pollutant Discharge Elimination System (NPDES) Regulations</b> • Best Management Practices (BMP) Program	40 CFR 125  104	Compliance with current Site Storm Water Management Plan will constitute field compliance with FWPCA	X	X
<b>Endangered Species Act (ESA)</b>	50 CFR 402	Identify and minimize early in the planning stage of an action any potential conflicts between the action and federally listed species	X	
<b>Migratory Bird Treaty</b>	50 CFR 10	Prevent or minimize contact with listed birds and nests Consult with the responsible RFETS ecologist	X	
<b>Solid Waste Disposal Act (RCRA) Colorado Hazardous Waste Act (CHWA)</b> Solid Waste Disposal Sites and Facilities  • Definitions	6 CCR 1007-2  Section 1 2	Soil generated during remediation will be characterized Contaminated soil will then be placed in containers for offsite disposition If contaminated soil is not immediately shipped to a waste disposal facility, waste will be managed onsite in accordance with substantive requirements	X	
<b>Identification and Listing of Hazardous Waste</b>  <b>Generator Standards</b> • Hazardous Waste Determinations • Hazardous Waste Accumulation Areas	6 CCR 1007-3, Part 261  6 CCR 1007-3 Part 262 11 262 34(a)(1)(i)(11)(iv, excluding A&B) (a)(3), (a)(4), (c)(1)	All remediation waste will be characterized to determine a hazardous waste classification  Waste characteristics will be determined Waste will be staged onsite in appropriate storage facilities	X  X	X
<b>Contingency Plan and Emergency Procedures</b> • Purpose and Implementation • Emergency Coordinator • Emergency Procedures	6 CCR 1007-3 Part 264, Subpart D 51 (b) 55 56 (a-1)	Emergencies such as fire, explosion, or release of hazardous waste will be mitigated immediately A designated employee will be responsible for coordinating emergency response actions	X	X

Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
<b>Manifest System, Record Keeping, and Reporting</b> <ul style="list-style-type: none"> <li>• Operating Record</li> <li>• Record Keeping</li> </ul>	6 CCR 1007-3, Part 264, Subpart E 264 73 264 74	Use of WEMS and compliance with RFETS disposal procedures will constitute compliance	X	X
<b>Use and Management of Containers</b> <ul style="list-style-type: none"> <li>• Condition of Containers</li> <li>• Compatibility of Waste in Containers</li> <li>• Management of Containers</li> <li>• Inspections</li> </ul>	6 CCR 1007-3 Part 264, Subpart I 171 172  173 174	Containers will be maintained in good condition and kept closed except when adding or removing waste Waste will be compatible with containers	X	X
<b>Miscellaneous Units</b> <ul style="list-style-type: none"> <li>• Environmental Performance Standards</li> <li>• Monitoring, Analysis, Inspection, Response, Reporting, and Corrective Action</li> <li>• Post-Closure Care</li> </ul>	6 CCR 1007-3 Part 264, Subpart X [40 CFR Part 264, Subpart X] 601  602  603	The thermal desorption unit will be designed, constructed, operated, and maintained in a manner that protects groundwater, surface water, wetlands, soil, and air		X
<b>Air Emission Standards for Process Vents</b> <ul style="list-style-type: none"> <li>• Standards Process Vents</li> <li>• Standards Closed-Vent Systems and Control Devices</li> <li>• Test Methods and Procedures</li> </ul>	6 CCR 1007-3 Part 264, Subpart AA  1032 1033  1034	Air emission standards will be incorporated into the design of process vents associated with thermal desorption operations to achieve compliance with requirements for hazardous wastes with organic concentrations equal to or greater than 10 parts per million (ppm) (by weight)		X

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Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
<b>Corrective Action for Solid Waste Management Units</b> <ul style="list-style-type: none"> <li>Temporary Units</li> </ul>	6 CCR 1007-3, Part 264 553 (a-e) [40 CFR Part 264, Subpart S]	Hazardous or mixed waste may be stored in a temporary unit. This status is appropriate because of the short duration of operation of the unit, limited potential for release from the unit, and type of unit being established.	X	X
<ul style="list-style-type: none"> <li>Staging Piles</li> </ul>	554(a-k)	The volume of Tier I soil will be wrapped in material that will isolate it from surrounding environmental media or in some other manner that meets the requirements of 264 554(d)(1).		
Thermal Treatment	6 CCR 1007-3 Part 265, Subpart P	Operating parameters will be incorporated in system design as appropriate for thermal desorption technology.	X	X
<b>Land Disposal Restrictions (LDRs)</b> <ul style="list-style-type: none"> <li>Dilution Prohibited as a Substitute for Treatment</li> <li>LDR Determination (Determination if Hazardous Waste Meets the LDR Treatment Standards)</li> <li>Special Rules for Wastes that Exhibit a Characteristic</li> <li>Universal Treatment Standards for VOCs</li> </ul>	6 CCR 1007-3 Part 268 [40 CFR Part 268]  3 7 9 (a-c) 48	Hazardous remediation waste treated in the thermal desorption unit will meet the substantive requirements outlined in the regulation.		X
<b>Toxic Substances Control Act (TSCA) Disposal Requirements</b> <ul style="list-style-type: none"> <li>Applicability</li> <li>Disposal Requirements</li> <li>PCB Remediation Waste</li> <li>PCB Bulk Product Waste</li> <li>Disposal of R&amp;D and Chemical Analyses Wastes</li> </ul>	40 CFR 761  761 50 761 60 761 61 761 62 761 64	All PCB waste stored or disposed will be controlled to meet applicable requirements.	X	
<b>Chronic Beryllium Disease Prevention Final Rule</b> <ul style="list-style-type: none"> <li>Definitions</li> <li>Waste Disposal</li> <li>Warning Labels</li> <li>Release Criteria</li> </ul>	10 CFR 850  3 32 38(b-c)	Debris suspected of being contaminated with beryllium >0.2 microgram per 100 square centimeters ( $\mu\text{g}/100\text{ cm}^2$ ) will be controlled and disposed so as to meet applicable requirements.	X	

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Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
<b>Radiation Control</b>	6 CCR 1007-1			
Emergency Plan – Required if material quantity exceeds Schedule E of Part 3 (e g , 2 curies of alpha emitters) and evaluation shows maximum dose to offsite person from release exceeds 1 rem (5 rem to thyroid)	RH 3 9 1 1	DOE maintains its Emergency Plan in accordance with DOE Order 151 1, <i>Comprehensive Emergency Management System</i>	X	X
Decommissioning Plan Contents – Must include a description of methods used to ensure protection of workers and the environment against radiation hazards during decommissioning	RH 3 16 4 3 3	Procedures to meet 10 CFR 835, <i>Occupational Radiation Protection</i> , and the Site's Integrated Work Control Program (IWCP) process will be described for proposed actions	X	X
Decommissioning Plan Contents – Must include a description of the planned final radiation survey	RH 3 16 4 3 4	Planned implementation of the Decommissioning Characterization Protocols or any final sampling and analysis plan for environmental media will be described	X	X
Decommissioning Plan Contents – Must include a description of the intended final condition of the site, buildings, and/or outdoor areas upon decommissioning	RH 3 16 4 3 6	The intended condition upon completion of an accelerated action will be described in the Notification	X	X
Decommissioning Plan Contents – If proposing to use the criteria in RH 4 61 3 or RH 4 61 4 (restricted access), the plan must include analysis demonstrating that reductions in residual radioactivity necessary to comply with the provisions of RH 4 61 2 (unrestricted access) would result in net public or environmental harm or were not being made because residual levels of contamination associated with restricted conditions are ALARA, taking into account consideration of any detriments expected to potentially result from decontamination and waste disposal	RH 3 16 4 3 7 1	The analysis will be part of any accelerated action or final action regulatory decision document for environmental media cleanup projects proposing restricted access	X	X

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Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
Decommissioning Plan Contents – If proposing to use the criteria in RH 4 61 3 or RH 4 61 4 (restricted access), the plan must include an analysis demonstrating that if institutional controls were no longer in effect, the dose criteria of RH 4 61 3 3 (described below) will be met	RH 3 16 4 3 7 3		X	X
Decommissioning Plan will be approved by CDPHE if information therein meets RH 3 16 and RH 4 61, decommissioning is completed as soon as practicable, and the health and safety of the public is adequately protected	RH 3 16 4 6	This section also specifies requirements for a long-term care warranty under RH 3 9 5 10 that may be required if using the criteria in RH 4 61 3 or RH 4 61 4 (restricted access) The RFCA Parties agree that further analysis is required to determine whether long-term care warranty requirements are relevant and appropriate to Rocky Flats Planned implementation of Site-approved procedures to meet DOE Order 5400.5, <i>Radiation Protection of the Public and the Environment</i> , and the Site's IWCP process, which includes LRA involvement, will be described for proposed actions The Closure Project Baseline is focused on achieving decommissioning as soon as practicable	X	X
Site radiation survey to establish residual contamination levels and/or confirm absence of contamination As appropriate, survey building/outdoor areas that contain residual radioactivity	RH 3 16 6 2	Requirements for radiation surveys are met through the Reconnaissance Level Characterization Survey Plans and Predemolition Survey Plans for facility decommissioning and through SAPs and the IMP for ER	X	X

Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
Submittal of final survey report, units, and other information specifies, as appropriate, that gamma levels be reported at 1 meter from the surface in microrem/hour (hr), removable and fixed contamination in disintegrations per minute per 100 square centimeters (dpm/100 cm <sup>2</sup> ), and radioactive concentrations in picocuries per liter (pCi/L) or per gram Identify instruments used and certify proper calibration/testing	RH 3 16 6 3	Same as RH 3 16 6 2 above	X	X
Radiation Protection Program – To the extent practicable, procedures and controls used shall be based on sound radiation protection principles to achieve public doses that are ALARA	RH 4 5 2	Planned implementation of Site-approved procedures to meet 10 CFR 835, <i>Occupational Radiation Protection</i> , DOE Order 5400 5, <i>Radiation Protection of the Public and the Environment</i> , and the Site's IWCP process, which includes LRA involvement, will be described for proposed actions	X	X
Radiation Protection Program – Imposes constraint on air emissions of radioactive material to the environment "Individual member of the public likely to receive the highest dose" will not be expected to receive a total effective dose equivalent (TEDE) greater than 10 mrem/yr from air emissions Requires exceedance reporting and corrective action to ensure against recurrence	RH 4 5 4	Listed only for completeness of this table NESHAP already identified as ARAR Radionuclide NESHAP-required monitoring established at Site perimeter is used to determine potential for exposure to individual member of the public	X	X
Dose Limits for Individual Members of the Public – TEDE from licensed operations less than 100 mrem/yr above background, exclusive of medical exposure and exposure from disposal by sanitary sewer Dose rate in unrestricted areas less than 2 mrem/hr	RH 4 14 1	Site-approved procedures to meet DOE Order 5400 5, <i>Radiation Protection of the Public and the Environment</i> , are based on the same dose rate limits	X	X

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Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
Dose Limits for Individual Members of the Public – Surveys of radiation levels in unrestricted areas and radioactive materials in effluents released to unrestricted areas shall be made to demonstrate compliance with the dose limits for individual members of the public in RH 4 14	RH 4 15 1	Surveys are conducted pursuant to Site-approved procedures to meet DOE Order 5400 5, <i>Radiation Protection of the Public and the Environment</i> Radionuclide NESHAP-required monitoring established at Site perimeter is used to determine potential for exposure to individual member of the public Surface water is monitored in accordance with the IMP and RFCA Attachment 5	X	X
Dose Limits for Individual Members of Public – Provides the means to demonstrate compliance with RH 4 14 by measurement or calculation that dose does not exceed the annual limit or by demonstrating that annual average radioactive material concentration released in gaseous and liquid effluents at boundary of the unrestricted area does not exceed Appendix B, Table II, "Effluent Concentrations "	RH 4 15 2 1 and 2	Site-approved procedures to meet DOE Order 5400 5, <i>Radiation Protection of the Public and the Environment</i> , are based on the same dose rate limits Radionuclide NESHAP required monitoring established at Site perimeter is used to determine potential for exposure to individual member of the public Surface water is monitored in accordance with the IMP and RFCA Attachment 5	X	X
Surveys shall be made as necessary to evaluate radiation levels, concentrations of radioactive material, and potential radiological hazards that could be present	RH 4 17 1	Planned implementation of Site-approved procedures to meet 10 CFR 835, <i>Occupational Radiation Protection</i> , DOE Order 5400 5, <i>Radiation Protection of the Public and the Environment</i> , and the Site's IWCP process, which includes LRA involvement, will be described for proposed actions Requirements for radiation surveys are met through the Reconnaissance Level Characterization Survey Plans and Predemolition Survey Plans for facility decommissioning and through SAPs and the IMP for ER	X	X

Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
Instruments and equipment used for qualitative radiation measurements must be calibrated at intervals not to exceed 12 months, unless otherwise noted by regulation	RH 4 17 2		X	X
Waste Disposal – Shall dispose only by transfer to authorized recipient, by release in effluents within the limits of subpart RH 4 14 (discussed above), or as authorized pursuant to (pertinent to RFETS) RH 4 34, <i>Method for Obtaining Approval of Proposed Disposal Procedures</i> , or RH 4 35, <i>Disposal by Release into Sanitary Sewerage</i>	RH 4 33	Transfer to authorized recipient is met through compliance with the "offsite rule," 40 CFR 300 440 Proposals for onsite disposal of radioactive waste (if any) will be part of any accelerated action, or any final action regulatory decision document for environmental media cleanup projects proposing specific disposal methods RH Part 11, <i>Special Land Ownership Requirements</i> , which addresses requirements if government ownership of RFETS is transferred to private ownership, and RH Part 14, <i>Licensing Requirements for Land Disposal of Low Level Radioactive Waste</i> , will be reviewed for relevant and appropriate requirements for cleanup projects proposing specific disposal methods	X	X
Radiological Criteria (for Decommissioning) – Determination of dose and residual activity levels which are ALARA must take into account consideration of any detriments expected to potentially result from decontamination and waste disposal	RH 4 61 1 3	The analysis will be part of any accelerated action for environmental media cleanup projects and will be provided in the Notification unless it is included in the RSOP itself and any final action regulatory decision document See the Radionuclide Soil Action Level (RSAL) Regulatory Analysis for the RFCA Parties understandings regarding implementation of the "Decommissioning Rule "	X	X

Requirement	Citation	Compliance Strategy	Excavate	Stabilize or Treat
Criteria for Unrestricted Use – Residual radioactivity above background has been reduced to levels that are ALARA and results in TEDE to the average member of the critical group that does not exceed 25 mrem/yr, including groundwater sources of drinking water	RH 4 61 2	The analysis will be part of any accelerated action for environmental media cleanup projects and any final action regulatory decision document See the RSAL Regulatory Analysis for the RFCA Parties understandings regarding implementation of the “Decommissioning Rule ”	X	X
Criteria for Restricted Use – Must demonstrate that further residual radioactivity reductions to meet Unrestricted Use  1) Would result in net public or environmental harm, OR 2) Are not being made because residual levels are ALARA	RH 4 61 3 1	See the RSAL Regulatory Analysis for the RFCA Parties understandings regarding implementation of the “Decommissioning Rule ”	X	X
Criteria for Restricted Use –  1) Provisions made for durable, legally enforceable institutional controls that provide reasonable assurance that TEDE to the average member of the critical group will not exceed 25 mrem/yr, AND 2) If institutional controls were no longer in effect, TEDE above background is ALARA and would not exceed either 100 mrem/yr OR 500 mrem/yr, if demonstrated that further reductions are not technically achievable, would be prohibitively expensive, or would result in net public or environmental harm	RH 4 61 3 2 and 3	See the RSAL Regulatory Analysis for the RFCA Parties understandings regarding implementation of the “Decommissioning Rule ”	X	X
Alternate (Decommissioning) Criteria  1) Analysis provides assurance that public health and safety would continue to be protected and unlikely that TEDE would be more than 100 mrem/yr 2) Employment of restrictions on site use that minimize exposures at the site  Doses are reduced to ALARA	RH 4 61 4 1 1 through 3	See the RSAL Regulatory Analysis for the RFCA Parties understandings regarding implementation of the “Decommissioning Rule ”	X	X

## **5.2 DATA QUALITY OBJECTIVES**

The ER RSOP decisions are based on the Preliminary Data Quality Objectives for the Industrial Area Sampling and Analysis Plan (DOE 2000d). DQOs for accelerated action decisions contain data aggregation and AL comparison rules as illustrated on Figure 7. Data aggregation and AL comparison methods are detailed in the IASAP (DOE 2001b) and the Draft Final BZSAP (DOE 2002). Action will be taken based on these DQOs in accordance with the following:

- When the 95% upper confidence limit (UCL) of the mean COC concentration across an area of concern (AOC) is above RFCA Tier I ALs for surface soil or agreed-upon cleanup levels for subsurface soil, or the sum of the ratios of the 95% UCLs of the mean concentration for COCs across an AOC to their respective RFCA Tier I ALs is greater than 1 for surface soil or agreed-upon cleanup levels for subsurface soil
- When analytical results indicate contaminant concentrations between Tier I, or agreed-upon cleanup levels, and Tier II, the AOC will be evaluated to determine whether additional remediation or management is warranted to protect surface water and ecological resources. Additional Site studies, including the Actinide Migration Evaluation (AME), SWWB, Land Configuration Design Basis (LCDB), and IMP, may provide information for this evaluation
- When analytical results indicate a hot spot is present according to the elevated measurement comparison in the IASAP (DOE 2001b) and BZSAP (DOE 2002)

A detailed description of the data aggregation, analysis, and hot spot determination is presented in the IASAP (DOE 2001b) and Draft Final BZSAP (DOE 2002).

## **5.3 ROUTINE ACTIONS**

The term "routine" as used in the ER RSOP is generally consistent with other industry definitions of the term (i.e., activities of a repetitive nature guided by procedures). Three key considerations support the ER RSOP concept of routine (versus nonroutine):

1. ER RSOP actions all involve the excavation of soil and associated debris. Furthermore, the range of PCOCs is fairly narrow and remediation options are limited.
2. Although both the amount of contamination and configuration of contaminant release sites vary, the remediation options remain limited. The variation in configuration and amount of contamination may change the complexity of the cleanup action, however, the essential repetitiveness of the remediation remains the same. Variations in complexity are addressed through application of the appropriate work controls.
3. Nonroutine remediation actions are those that require special engineering design and/or regulatory agency approval. These actions are not covered under the ER RSOP and include closure of the two landfills and the SEP, remediation of groundwater plumes, the 903 Lip Area and Americium (Am) Zone, and portions of the Original Process Waste Lines (OPWL) as described below.



Remediation through excavation of contaminated soil and associated OPWL at IHSSs, PACs, and UBC sites and OPWL outside of IHSSs, PACs, and UBC sites, including the sealing of pipes, is covered under the ER RSOP. OPWL remediation that is not excavation (i.e., not the ER RSOP remedy) will be covered under a separate decision document. If, for example the remedy is to "stabilize in place," the remediation is not routine and would require different documentation. In this case, a Proposed Action Memorandum (PAM) or IM/IRA will be developed. The "different action" could also include a range of options that cannot be identified at this time.

It is anticipated that contaminated soil and debris in all IHSSs, PACs, and UBC sites, except those excluded above, will be remediated under the ER RSOP. This would include the OPWL, New Process Waste Lines (NPWL), sanitary sewers, and storm drains, as well as several other below ground structures (slabs, foundation drains, sumps, tanks, and other structures) that will not be dealt with during decommissioning.

Figure 8 illustrates the difference between routine and nonroutine actions. As shown in this figure, the decision whether an action is routine can be made before remediation or may be made during remediation when more information is available. If the contamination can be remediated through excavation, it is routine. If the excavation technique is not described in the ER RSOP, a modification will be developed before remediation proceeds. If special work controls are required, they are developed and implemented before remediation. If, during remediation, unanticipated complexities are encountered, a decision whether the contamination can be remediated through excavation is made. If the contamination can be remediated through excavation, work is paused and additional work controls are evaluated and implemented.

If DOE were confident, before remediation started, that remediation would require more than excavation (e.g., excavation plus a diversion ditch), a PAM or IM/IRA would be developed instead of invoking the ER RSOP. Figure 8 also illustrates the sequence of events for routine actions where debris, incidental water, or high contaminant levels are found.

#### **5.4 LONG-TERM STEWARDSHIP**

Accelerated action planning and implementation include consideration of long-term stewardship goals. The stewardship evaluation, conducted during the accelerated action planning process, takes into account potential post-closure actions so that accelerated actions are consistent with the RFCA Vision for long-term stewardship. The results of the stewardship evaluation, which will include whether additional remediation is warranted, will be documented in the ER RSOP Notification. The results of the stewardship evaluation (Figure 9) will be used during the accelerated action implementation in conjunction with the ALARA process.

Many of the stewardship controls will be applied on a sitewide basis and will not be affected by individual actions discussed in this RSOP. DOE will consider additional remediation beyond ALs in those cases where remediation would eliminate the need for specific institutional controls.

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### **5.4.1 Accelerated Actions**

Because the ER RSOP addresses accelerated actions, the primary contribution of remediation under the ER RSOP to long-term stewardship is risk reduction through source removal. Additionally, when removal of the contaminants is the action, long-term stewardship considerations are unlikely to lead to any modification of the type of action to be undertaken. The ER RSOP also includes work controls and procedures to protect human health and the environment during accelerated actions. Long-term adverse impacts from the actual remediation activities are not expected.

In accordance with RFCA, excavation to RFCA ALs is considered protective of human health and the environment for the anticipated land use. Remediation under the ER RSOP will be conducted to the agreed-upon cleanup levels based on RFCA ALs and stewardship and ALARA considerations. However, additional long-term stewardship considerations may impact cleanup decisions.

Evaluation of long-term stewardship criteria is incorporated into the planning process. The stewardship evaluation will be conducted during the planning process, because all of the stewardship evaluation criteria, except the amount of contamination in soil, will be known at that time. The stewardship evaluation will be conducted by ER staff in consultation with the regulatory agencies to determine whether additional remediation is required and will be included in the ER RSOP Notification. Accelerated action remediation goals may be modified by results of the stewardship and ALARA evaluations. When accelerated action remediation goals are achieved, confirmation samples will be collected and the remediation area will be surveyed. Based on the amount and configuration of residual contamination, near-term requirements will be implemented and long-term recommendations for institutional or physical controls will be documented in the Closeout Report. Stewardship recommendations will be summarized yearly for use in the RI/FS and RFETS Stewardship Plan. Remediation data, including levels and location of residual contamination, if any, will be documented in the Closeout Report and archived for use in the RI/FS, CRA, and CAD/ROD.

The long-term stewardship evaluation includes the following:

- Proximity to other contaminant sources,
- Surface water protection,
- Monitoring requirements, and
- Near-term and long-term institutional controls or physical controls

Figure 9 illustrates an overview of the long-term stewardship evaluation and its relationship to ALARA and remediation activities. This stewardship evaluation will consider the factors shown on Figure 9 and described in the following sections:

### **Proximity to Other Contaminant Sources**

Surrounding and adjacent IHSS Groups may influence post-remediation impacts from IHSS Group remediations. These impacts are best considered in whole rather than individually so that institutional controls and monitoring requirements can be consolidated. Combining stewardship considerations for these areas could result in additional remediation and/or more effective stewardship actions especially if engineered controls are needed. For example, when an IHSS Group is isolated from other contaminant sources, additional remediation will be considered. This could result in a reduction of potential future institutional controls over large areas.

### **Surface Water Protection**

In the context of this RSOP, remediation to agreed-upon cleanup levels will be evaluated to ensure protection of surface water. Future RFCA decision documents regarding surface water quality may impact this RSOP approach. Surface water protection considerations include the following:

- Subsurface soil ALs were developed to be protective of surface water quality standards and radionuclide subsurface soil ALs are equal to surface soil ALs. Nonradionuclide ALs are protective of surface water.
- Areas where surface soil is remediated to agreed-upon cleanup levels will be backfilled according to Section 6.11, stabilized, and revegetated. This will prevent erosion of soil with residual contamination into surface water.
- The final land configuration will provide additional cover where required.

Where a pathway to surface water exists, the following questions will be addressed:

- Do characterization data indicate there are contaminants in surface soil?
- Do monitoring results from points of evaluation (POEs) or points of compliance (POCs) (Figure 10) indicate there are surface water impacts from the area under consideration?
- Is the IHSS Group in an area with high erosion potential, based on the 100-Year Average Erosion Map shown on Figure 11 (DOE 2000e)?

If additional remediation and/or management are indicated, the consultative process will be used to determine the following:

- Remediation targets (area and COCs), if necessary, and
- Management actions, if necessary, which may include stabilization, monitoring, or best management practices (BMPs).

### **Monitoring**

Current surface water and groundwater monitoring networks are shown on Figures 10 and 12, respectively. The current monitoring system may be modified by addition of surface water or groundwater performance monitoring stations in accordance with the IMP. The evaluation of monitoring requirements will be based on the following:

- Do monitoring results from POEs or POCs (Figures 10 and 12) and performance monitoring stations indicate there are groundwater or surface water impacts from the area under consideration?
- Can the impact be traced to a specific IHSS Group?
- Will additional remediation reduce the cost of long-term monitoring?
- Are additional monitoring stations needed?
- Can existing monitoring locations be deleted if additional remediation is conducted?

If the impacts can be traced to a specific IHSS Group, additional remediation or monitoring may be indicated. If additional remediation or monitoring is indicated, the consultative process will be used to determine additional remediation targets or the type and placement of additional monitoring stations.

The benefit of conducting additional remediation to reduce long-term monitoring requirements will be evaluated during remediation in conjunction with the ALARA evaluation. This evaluation will include a soil volume estimate, remediation costs, and disposal costs to reduce contamination to appropriate levels. These costs will be compared to the cost of reducing long-term monitoring requirements. Long-term monitoring costs will be described in the Stewardship Plan.

Performance monitoring stations will be used, if necessary, to provide additional monitoring around areas during remediation. Additional monitoring may be required at sites that are not remediated to agreed-upon cleanup levels or at areas that have the potential to adversely impact surface water.

Additional remediation may eliminate the need for existing monitoring stations. The consultative process will be used to determine when monitoring stations can be eliminated.

**THIS TARGET SHEET REPRESENTS AN  
OVER-SIZED MAP / PLATE FOR THIS  
DOCUMENT**

**Final Environmental Restoration  
RSOP for Routine Soil Remediation  
January 2002**

**Figure 12:  
Groundwater Monitoring Locations**

**November 20, 2001**

**Map ID: 01-0833**

**CERCLA Administrative Record document, SW - A - 004453**

**U S DEPARTEMENT OF ENERGY  
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE**

**GOLDEN, COLORADO**

12

### **Institutional Controls**

Besides continued restricted Site access, institutional controls will be used for near-term management and long-term stewardship. It is anticipated that near-term and long-term controls will likely consist of the following:

- Federal ownership (either DOE or the U S Fish and Wildlife Service),
- Land use restrictions by deed and/or covenant, and
- Permanent restrictions on groundwater and onsite surface water use

Other Site work control processes may also be used to control access to these sites

### **Physical Controls**

Physical controls, including engineered controls, will be used for near-term management and long-term stewardship. It is anticipated that physical controls may consist of the following:

- Caps or covers,
- Erosion controls (grading, terracing, etc ),
- Diversion ditches,
- Holding ponds,
- Groundwater barriers,
- Permanent fencing and signage, and
- Additional fencing and signage within Site boundaries for areas that are capped and areas where excavation or other activities are restricted

Engineered controls will be described in a separate RFCA decision document. Decision documents could include PAMs, IM/IRAs, or a CAD/ROD.

Many of the previously discussed controls will be applied on a sitewide basis and will not be affected by individual actions discussed in this RSOP. DOE will consider additional remediation beyond ALs in those cases where remediation would eliminate the need for specific institutional controls, such as fencing.

### **Documentation**

Stewardship activities and information will be documented so that information is available for the RI/FS, CRA, CAD/ROD, and long-term stewardship planning. Table 4 lists where information will be available.

**Table 4**  
**Stewardship Documentation**

<b>Activity/Information</b>	<b>Archived In</b>	<b>Information Format</b>
Stewardship evaluation	ER RSOP Notification, Closeout Report, annual stewardship summary	Text
Location and characterization of residual contamination	Closeout Report, HRR, SWD, RADMS	Text and electronic data
Location and characterization of remaining pipelines	Closeout Report, HRR, SWD, RADMS	Text and electronic data
Stewardship recommendations	Closeout Report, annual stewardship summary	Text

Confirmation sampling (Section 6 10) will be conducted at remediated areas in accordance with the IASAP (DOE 2001b) and Draft Final BZSAP (DOE 2002) Information gathered during sampling will include characterization data, confirmation sampling data, maps of residual contamination areas, and stewardship recommendations These data will be included in the Closeout Report (Section 6 13) and the AR, and will be available for long-term stewardship planning

Groundwater and surface water monitoring results are documented in quarterly IMP reports The Closeout Report and IMP reports become part of the AR

#### **5.4.2 Sitewide Studies**

Several of the sitewide studies currently in progress will have a significant effect on stewardship activities Results of these studies will be summarized in the RI/FS These studies and their contribution to long-term post-closure stewardship goals are described below

##### **Actinide Migration Evaluation**

AME staff evaluates the behavior and mobility of actinides in surface water, groundwater, and soil environments Results of AME studies may be used when planning stewardship activities AME studies and their relevance to stewardship planning include the following

- Report on Soil Erosion and Surface Water Sediment Transport Modeling for the Actinide Migration Evaluations at the Rocky Flats Environmental Technology Site (DOE 2000e) - Results of this study include average erosion rates for Site watersheds, erosion mechanisms, actinide source areas that have the potential to impact surface water quality, and model simulations for Pu-239/240 and Am-241 concentrations in Site streams The results of this study may be used to evaluate potential impacts to surface water from soil erosion sitewide and at IHSSs, PACs, and UBC sites that have surface soil radionuclide activities between RFCA Tier I and Tier II ALs Additionally, erosion-modeling results may be used in implementing erosion controls at remediation sites

- Final Report on Phase Speciation of Pu and Am for Actinide Migration Studies (DOE 2000f) - Results of this study indicate Pu and Am solubility is limited in natural water. Both Pu and Am can be transported by sorption onto and migration with colloidal particles. Particulate transport is the dominant mechanism for Pu migration at RFETS. The results of this study may be used to evaluate potential impacts to surface water at IHSSs, PACs, and UBC sites.
- Air Transport and Deposition of Actinides at the Rocky Flats Environmental Technology Site (DOE 1999b) - This study focused on emission of actinides into the air from contaminated soil or debris (resuspension), transport of airborne actinides (dispersion), and removal of actinide-contaminated particles from the air to soil or water (deposition). The results of this study will be used when planning dust and other airborne contaminant controls at remediation sites.
- FY01 studies focused on the relationship between actinides and colloid stability in the environment. Results of these studies may be used, when available, to plan and implement erosion controls at remediation sites.

### **Site-Wide Water Balance**

The purpose of the SWWB is to develop information to support a hydrologic design basis for RFETS closure activities. ER remediation, sitewide closure activities, and the final end-state configuration have the potential to significantly alter groundwater, surface water, and near-surface flow at the Site. Many RFETS closure decisions are dependent on SWWB information. The objectives of the SWWB are to provide RFETS with a management tool for the following:

- Evaluate how the sitewide water hydrology changes from present to final Site configuration,
- Predict surface water impacts from groundwater for present and final Site configuration,
- Provide data for the final IA configuration (cover design and land recontouring) to protect surface water quality,
- Provide information for the CRA and CAD/ROD, and
- Provide information for stewardship planning.

### **Land Configuration Design Basis**

The purpose of the LCDB Project is to define the design basis upon which a final land configuration can be developed. In conjunction with identifying the functional design objectives and developing the design basis, three bounding scenarios (wetlands, retention, and source isolation) were identified to represent relative extremes of distinct and unique approaches.

The bounding scenarios have been modeled and are currently being evaluated by AME staff. Output from these evaluations will be used to aid in formulation of an initial conceptual design (ICD) component description. This ICD component description will be used as a discussion point and to help guide decommissioning, ER, and stewardship decisions. Data gaps that must



be addressed prior to the development of a conceptual design and final design will also be identified

## 5.5 ALARA

RFETS-specific requirements include implementation of DOE Order 5400.5, *Radiation Protection of the Public and the Environment*, ALARA Objectives. The definition of ALARA in DOE Order 5400.5 is,

“ALARA is a phrase (acronym) used to describe an approach to radiation protection to control or manage exposures (both individual and collective to the work force and the general public) and releases of radioactive material to the environment as low as social, technical, economic, practical, and public policy considerations permit. As used in this Order, ALARA is not a dose limit, but rather it is a process that has as its objective the attainment of dose levels as far below the applicable limits of the Order as practicable.”

These objectives are consistent with the ALARA objectives specified in the Radiation Control ARARs, Table 3, Section 5.1.3 of this RSOP. Table 5 lists locations in the ER RSOP or other decision documents where the ARARs are addressed.

**Table 5**  
**ARAR Requirements**

ARAR Requirement	ARAR Citation (Table 3)	Decision Document Where ARAR Is Implemented
Methods to Ensure Protection of Workers	RH 3.16.4.3.3	ER RSOP Sections 6.2, 8.0, and 9.0
Description of Final Radiation Survey	RH 3.16.4.3.4	IASAP and BZSAP Sections 4.5 and 4.6
Intended Final Condition	RH 3.16.4.3.6	ER RSOP Notification
ALARA Analysis	RH 3.16.4.3.7.1 RH 3.16.4.3.7.3	ER RSOP Section 5.5
Institutional Controls	RH 3.16.4.3.7.3 RH 3.16.4.6	CAD/ROD
Radiation Surveys	RH 3.16.6.2	IASAP and BZSAP Sections 4.5 and 4.6
Submittal of Survey Report	RH 3.16.6.3	Closeout Report
Radiation Protection Program	RH 4.5.2	Incorporated through ER RSOP Sections 6.2, 8.0, and 9.0
Radiation Protection Program	RH 4.5.4	ER RSOP Section 7.0

<b>ARAR Requirement</b>	<b>ARAR Citation (Table 3)</b>	<b>Decision Document Where ARAR Is Implemented</b>
– Air		
Radiation Protection Program – Dose limits	RH 4 14 1 RH 4 15 1 RH 4 15 2 1 RH 4 15 2 1	Incorporated through ER RSOP Sections 6 2, 8 0, and 9 0
Radiation Protection Program – Surveys	RH 4 17 1 RH 4 17 2	IASAP and BZSAP and incorporated through ER RSOP Sections 6 2, 8 0, and 9 0
Waste Disposal	RH 4 33	ER RSOP Section 10 0
Radiological Criteria	RH 4 61 1 3	ER RSOP Section 5 5
Criteria for Unrestricted Use	RH 4 61 2	RFCA Attachment 5 and Appendix M
Criteria for Restricted Use	RH 4 61 3 1 RH 4 61 3 2 RH 4 61 3 3	RFCA Attachment 5 and Appendix M
Alternate Criteria	RH 4 61 4 1 1 through 3	RSAL Regulatory Analysis

The RFCA Parties are consulting regarding the process by which the common ALARA objectives are evaluated in relation to the cleanup actions covered by this RSOP. This consultation will include consideration of public comments regarding the ALARA approach.

### **5.5.1 ALARA Evaluation**

Remediation of soil through excavation is a conservative measure, and excavation to RFCA ALs is protective of human health and the environment for the appropriate land use. Because the ER RSOP covers accelerated actions, an ALARA evaluation will be used to determine whether additional remediation is indicated at IHSS Group remediations. The ALARA evaluation process and its relationship to stewardship and remediation are shown on Figure 9.

The ALARA evaluation will be conducted twice, once before remediation to ALs and once during remediation. Both evaluations will be conducted in consultation with the regulatory agencies. The ER RSOP ALARA evaluation will consider health and safety (H&S), technical feasibility, and cost.

The ER Project Manager and H&S Manager will conduct the ALARA evaluation in consultation with the regulatory agencies. During field implementation of the ER RSOP, the Project Manager and H&S Manager will evaluate in-process remediation data, H&S data, and physical conditions,

in consultation with the regulatory agencies, to determine whether additional remediation is required to achieve ALARA. If additional remediation is reasonable, remediation will continue. When remediation goals are achieved, confirmation samples will be collected and the remediation area will be surveyed. Remediation data including levels and location of residual contamination, if any, will be documented in the Closeout Report and archived for use in the RI/FS, CRA, and CAD/ROD.

These ALARA evaluation considerations are described in detail in the following sections.

### **Health and Safety Evaluation**

The H&S of workers is a prime concern during remediation especially during excavation. Although work controls will be used to control hazards to workers, there may be instances when continued excavation will endanger the H&S of the workers. If safety limits are exceeded during excavation to achieve ALARA, remediation will stop and the remediation will be considered ALARA. The decision to stop work because of H&S concerns will be made by the project H&S Manager and will be in accordance with current Site work controls. The H&S evaluation will include the following considerations:

- Will the excavation be deeper than 4 ft?
- Can a trench box (or multiple trench boxes) be used to protect H&S to a depth of 8 ft?
- Will the excavation be deeper than 8 ft?

### **Technical Feasibility Evaluation**

Technical feasibility will depend on the specifics of the contamination, the work processes required to continue the remediation, area- and weather-specific factors, and other technical considerations appropriate for that work.

### **Cost Evaluation**

For the purpose of the ER RSOP ALARA analysis, the evaluation will include estimates of the cost of additional soil removal, as well as the following criteria:

- Type of waste,
- Excavation and debris removal,
- Waste sampling,
- Waste packaging,
- Waste transportation and disposal,
- Backfill purchase and transportation, and

- Backfilling, compaction, and revegetation

The uncertainty of the estimates will be informally addressed through the consultative process

## **5.6 SOIL DISPOSITION**

Remediated soil will be dispositioned through the following activities

- Offsite disposal,
- Onsite thermal desorption with offsite disposal,
- Onsite thermal desorption with onsite backfilling, or
- Offsite thermal desorption with offsite disposal

Figure 13 illustrates the decision flow for soil disposition. Excavation, treatment, and disposal of remediated soil are described in Sections 6.0 (Project Approach) and 10.0 (Waste Management)

## **5.7 SUMMARY**

Decisions will be made throughout the planning and implementation phases of accelerated actions in consultation with the regulatory agencies. These decisions, their associated actions, and when they occur in the accelerated action process are summarized on Figure 14.

Accelerated action decisions will be made within the context of RFCA and regulatory requirements. RFCA and regulatory requirements guide data evaluation, the stewardship and ALARA evaluations, preparation of the Notification, and development of work control documents. These will be used to direct field implementation of accelerated actions.

Key decisions made during implementation are the following:

- Is remediation required?
- Does the ALARA evaluation indicate additional remediation?
- Does the stewardship evaluation indicate additional remediation or institutional or physical controls are required?
- Have remediation objectives been achieved?

Soil remediation waste will be appropriately disposed. Institutional and/or engineering controls will be implemented, if required, after field work is complete.

Accelerated action decisions and results will be documented through the closeout process. Data will be conveyed to the regulatory agencies and public through the Closeout Report and will be archived through RADMS in the Site environmental database (SWD) and the AR.

## **6.0 PROJECT APPROACH**

The approach to surface and subsurface soil and associated debris remediation at RFETS includes several key components that will be used routinely for each IHSS, PAC, or UBC site remediation. These components include the following:

- RFCA consultative process,
- Work process planning,
- Remediation, and
- Documentation

### **6.1 WORK PROCESS**

Figure 15 illustrates the routine remediation work processes and includes (1) the characterization process and how it fits in with the remediation process, (2) work planning, (3) data analysis, (4) soil and associated debris remediation, and (5) the Closeout Report.

IHSSs, PACs, and UBC sites will be sampled and evaluated in accordance with the IASAP (DOE 2001b) and Draft Final BZSAP (DOE 2002) to determine whether remediation is required. After characterization is complete, the analytical data will be evaluated and an accelerated action decision will be made. If remediation is required, a map of the remediation target will be prepared and discussed with the LRA.

### **6.2 WORK PLANNING**

Accelerated actions are conducted in accordance with the five core principles of the Integrated Safety Management System (ISMS):

- Define the work scope,
- Identify and analyze the hazards,
- Identify and implement controls,
- Perform the work, and
- Provide feedback

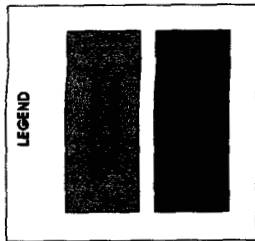
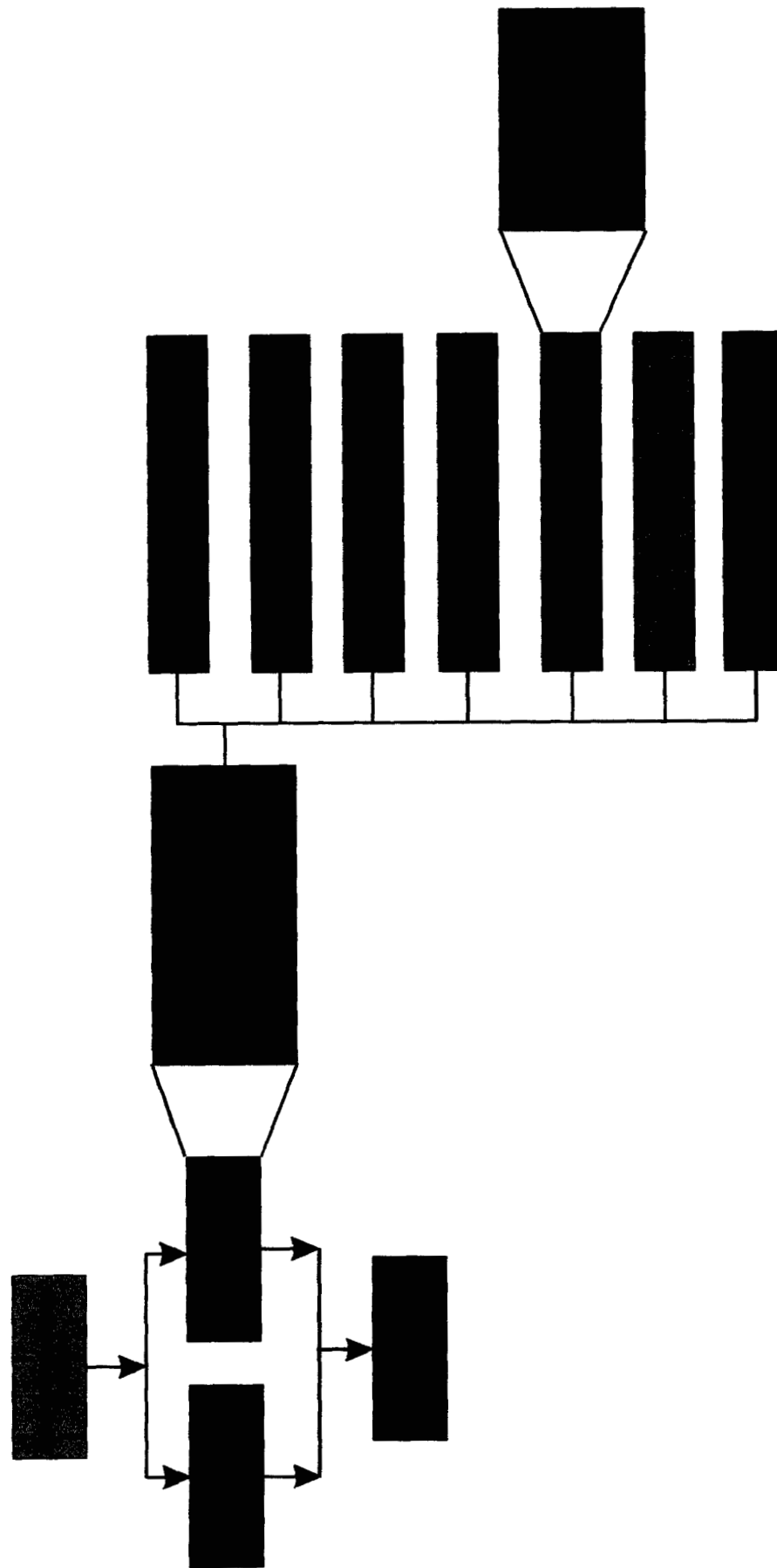


Figure 15  
ER RSOP Work Planning Process



At RFETS, ISMS is implemented through the Integrated Work Control Program (IWCP), which provides the framework for mitigating adverse impacts to workers, the public, and the environment. ISMS is implemented through Site-specific work control documents, as shown on Figure 15. Because work conducted in accordance with the ER RSOP is routine, preparation of work controlling documents and processes have been streamlined. Streamlined documents and processes include the IASAP (DOE 2001b), Draft Final BZSAP (DOE 2002), ER RSOP, Health and Safety Plan (HASP), Quality Assurance Program Plan (QAPP), Field Implementation Plan (FIP), Auditable Safety Analysis, Soil Disturbance Permit, Environmental Checklist, Criticality Safety Review, and Waste Instructions. These documents and processes were developed to provide requirements, methods, work controls, and instructions for all projects covered under this ER RSOP. Addenda will be developed for individual projects, as necessary.

Site-specific work control documents and requirements include the following:

- IA and BZ SAPs,
- ER RSOP for Routine Soil Remediation,
- Job site walkdown to determine potential hazards and equipment needs,
- Job Hazard Analysis (JHA), which includes specific work hazards and appropriate hazard controls,
- HASP Addendum, which includes project-specific additions to the remediation HASP,
- FIP Addendum, which includes project-specific additions to the remediation FIP,
- RFETS-specific permits and requirements (as required) including
  - Auditable Safety Analysis,
  - Soil Disturbance Permit to document potential contamination in areas where soil will be disturbed,
  - Radiological Work Permit (RWP) to document radiological controls (exposure limits) if necessary,
  - ALARA Job Review to determine operation controls to limit worker exposure,
  - Ecological Clearance to determine whether ecological resources may be impacted and whether impacts can be mitigated,
  - Criticality Safety Review to determine whether additional engineered or administrative safety controls are required,
  - Waste Instructions that include anticipated waste streams, packaging instructions, and sampling and analysis requirements,
  - Training Matrix, which includes project personnel, required training, and documentation of training, and

- Plan of the Week/Day to schedule, authorize, and control remediation activities and discuss planned activities and scheduling,
- Environmental Checklist to determine impacts to the environment and the impact of regulatory requirements,
- Management Readiness Assessment to document that all requirements for the project have been met, and
- Pre-Evolution Briefing conducted prior to the start of the remediation field work to ensure project personnel understand the project, hazards and controls, H&S requirements, and other Site requirements for the project

### **6.3 REMEDIATION MAPS**

Remediation maps will be developed using statistical and geostatistical analysis of characterization data. It is anticipated that geostatistical analysis will be used when sufficient data are available and there is a spatial correlation of the data. At hot spots, geostatistical analysis may not be appropriate, and a standard spatial contouring approach will be used.

#### **6.3.1 Geostatistical Remediation Maps**

As part of data analysis, a geostatistical approach may be used to generate potential remediation targets. Initially, maps showing the probability of exceeding the cleanup goals at IHSSs, PACs, and UBC sites are generated. From these "probability of exceedance" maps, remediation target maps can be developed for remediation goals at a number of levels of remediation reliability. The geostatistical approach is iterative and based on remediating to below required cleanup goals. Previous applications indicate this approach provides a high level of confidence that confirmation sampling will verify remediation is complete.

The process for determining remediation locations is described below.

- 1 Characterization data will be used to develop maps and histograms of the known distribution of contamination.
- 2 A variogram, which describes the geostatistical spatial correlation between the samples, will be generated.
- 3 The histogram, sample values, location, and variogram will be used for the geostatistical simulations. The simulations indicate the likely concentration and level of uncertainty about a concentration in nonsampled areas. The simulations are processed to produce maps defining the spatial distribution of the contaminants and the inherent uncertainty in the spatial distribution.
- 4 Probability maps that describe the likelihood that a contaminant value at any nonsampled location exceeds the AL are generated.



- 5 An excavation map is developed from the probability map. The excavation map requires that an acceptable reliability of remediation is determined.

The geostatistical approach is designed for contamination that exhibits spatial correlation, not for developing a remediation plan around a single "hot spot." Based on characterization sampling, a decision will be made as to whether the samples define a distributed contaminant (apply geostatistical approach) or a localized hot spot (as defined in Chapter 10 of Gilbert [1987]).

### **6.3.2 Hot Spot Remediation Maps**

In areas where hot spots are identified, remediation maps may use a variety of isopleth algorithms (including kriging, inverse distance functions, and triangulations, or similar spatial estimating techniques) for hot spot delineation, as stated in Section 5.3 of the IASAP (DOE 2001b) and Draft BZASP (DOE 2002). Data will be presented using the ER data management system (Section 12.0).

## **6.4 IN-PROCESS ANALYSIS AND CONFIRMATION SAMPLING**

The characterization team will conduct confirmation sampling and analysis on remediated areas to verify the site has been cleaned up with respect to remediation goals. The confirmation sampling and analysis will provide a representative assessment of the magnitude and spatial configuration of the COC(s) after remediation. The characterization team will implement an in-process and confirmation sampling approach that combines remediation with field instrument analysis.

During remediation, the characterization team will collect soil samples and use field analytical instrumentation to determine when remediation goals have been achieved. After remediation goals have been achieved based on field instrument data, confirmation sampling locations will be determined using statistical or geostatistical techniques as described in the IASAP (DOE 2001b) and Draft Final BZASP (DOE 2002). Post-remediation confirmation samples will be collected and analyzed onsite if appropriate data quality can be demonstrated. Otherwise, confirmation samples will be sent to an offsite laboratory for analysis. Offsite laboratory results will be verified and validated in accordance with RFETS Analytical Services Division (ASD) requirements.

The number and distribution of confirmation samples will be based on a 90 percent probability of detecting residual contamination greater than the cleanup goal and the size and spatial variability of the remediated site. Statistical or geostatistical sampling strategies will ensure the appropriate numbers of samples are collected from unbiased locations.

## **6.5 SOIL AND DEBRIS REMEDIATION**

This section describes the routine remediation actions covered by this ER RSOP. Excavation, treatment to meet regulatory and receiver site requirements, and disposal will be the dominant type of remediation action implemented through this ER RSOP. Thermal desorption may be considered if it is more technically and economically favorable for the given site condition, can be implemented within the constraints of the Site closure schedule, and is protective of human

health and the environment. The Notification will identify treatment, if any, chosen for each IHSS Group.

Routine remediation of soil and buried debris will consist of excavation and offsite disposal, with offsite treatment as required to meet regulatory and receiver site requirements. Soil remediation through excavation was successful at Trench 1 (DOE 1999c), Trenches 3 and 4 (DOE 1996a), Ryan's Pit (DOE 1997a), and the Mound Site (DOE 1997b) at RFETS.

Engineering and administrative controls will be implemented prior to and during excavation and treatment activities to control the spread of radiological and hazardous contaminants in accordance with job-specific work controls (Sections 6.2 and 9.0). Remediation activities will meet the substantive requirements of ARARs.

#### **6.5.1 Excavation, Offsite Treatment, and Disposal**

The remediation process for soil and associated debris is shown on Figure 16. Soil and associated debris contaminated above agreed-upon cleanup levels will be excavated and disposed offsite, with offsite treatment as necessary to meet regulatory or receiver site requirements. Soil and debris will be excavated with heavy machinery, including backhoes, front-end loaders, excavators, and vacuum systems. Cranes and other lifting equipment will be used for debris removal as necessary. All excavated soil and debris will be segregated by size, material type, and waste type. The waste will be transferred to rolloffs or other waste containers, managed onsite in accordance with substantive ARARs (Section 5.1.3), and dispositioned offsite. Soil and debris will be characterized to evaluate compliance with regulatory or receiver site requirements. Contaminated soil and debris that do not require treatment will be transferred to rolloffs or other waste containers, managed in accordance with substantive ARARs (Section 5.1.3), and dispositioned offsite.

After soil and debris contaminated above agreed-upon cleanup levels are removed, the excavation will be backfilled with onsite or offsite soil that meets backfill criteria described in Section 6.1.1. The backfilled excavation will be stabilized and revegetated in accordance with Section 6.1.4.

#### **6.5.2 Onsite Thermal Desorption**

Onsite thermal desorption of soil to meet regulatory or receiver site requirements or for backfilling will be considered if it is shown to be expedient, economical, and protective of human health and the environment. Onsite thermal desorption and backfilling will be considered when site VOCs exceed agreed-upon cleanup levels, radiological contamination is below Tier II ALs, and nonradiological contamination (excluding VOCs) is below Tier I ALs (e.g., metals, SVOCs, and PCBs). Onsite thermal desorption and offsite disposal may also be considered for VOC- and radionuclide-contaminated soil. Onsite thermal desorption was successfully demonstrated at Trenches 3 and 4 (DOE 1996a).

Areas of contaminated surface and subsurface soil and debris will be excavated with heavy machinery and transferred to an onsite thermal desorption treatment facility or remediated at the point of excavation. Transfer of soil will be by loader, backhoe, or conveyor belt. Thermal

desorption will be used to remove VOCs from the soil. Thermal desorption units used for onsite soil remediation will be portable and transported to the site of waste generation where possible. The appropriate system will be selected to accommodate the specific volumes and types of soil to be remediated. To ensure the contaminants are not combusted (incinerated), Indirect Thermal Desorption will be used because it applies heat in a manner that isolates the flame from contaminated material, raising the contents' temperature above the contaminant's vapor point, then removing the contaminant vapor for condensing.

VOCs will be removed from the soil within a closed system and will be either condensed into a liquid phase and/or collected on granular activated carbon. The closed system results in little to no volatile emissions to the atmosphere. Condensate removed from the system will be further treated by passing the liquid through an oil/water separator to remove dense nonaqueous phase liquids (DNAPLs) and light nonaqueous phase liquids (LNAPLs). DNAPLs and LNAPLs will be treated or disposed in an appropriate offsite facility. Residual liquids will be treated using an onsite water treatment system, or disposed at a K-H-approved offsite disposal facility. Detailed specifications of the selected thermal desorption units will be described in a Notification, when appropriate.

After soil has been treated, it will be sampled and analyzed to determine whether treatment was successful and regulatory and receiver site requirements or backfill criteria have been met. If receiver site requirements have been met, the waste will be packaged in accordance with waste management requirements, managed according to substantive ARARs (Section 5.1.3), and dispositioned offsite. If backfill criteria have been met, soil will be returned to the excavation or used as fill at some other acceptable onsite location. The backfilled excavation will be stabilized and revegetated (Section 6.1.4).

### 6.5.3 RCRA Units

There are several types of RCRA units that ER staff will have the responsibility or partial responsibility for closing. These units are listed in Table 6, illustrated on Figure 17, and consist of waste storage units and NPWL. Detailed drawings and figures of RCRA Units will be included in the Notification. These units were permitted under RFETS RCRA Permit CO-97-05-30-01.

**Table 6**  
**RCRA-Regulated Units**

<b>IHSS Group Number</b>	<b>IHSS/PAC Number</b>	<b>RCRA Unit Number</b>	<b>RCRA Unit Description</b>	<b>ER Responsibility</b>
000-4	PAC 000-504	374.3	NPWL	Close parts of this unit not covered by the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities (DOE 2001c)
000-4	PAC 000-504	374.3	Valve Vaults 1 – 20	Close unit
500-4	IHSS 117.2	18.03	Asphalt Pad – Parking Area East of Building 551	Remove asphalt, characterize asphalt and soil, remediate soil

IHSS Group Number	IHSS/PAC Number	RCRA Unit Number	RCRA Unit Description	ER Responsibility
				as necessary
700-8	IHSS 214	750 1/750 2	Asphalt Pads – 750 Pad	Remove asphalt, characterize asphalt and soil, remediate soil as necessary
900-3	IHSS 213	15	Asphalt Pad – 904 Pad	Remove asphalt, characterize asphalt and soil, remediate soil as necessary
N/A	N/A	1	Asphalt Pad, PACS 1 Container Storage	Remove asphalt, characterize asphalt and soil, remediate soil as necessary
N/A	N/A	10	Asphalt Pad, B561 Container Storage	Remove asphalt, characterize asphalt and soil, remediate soil as necessary
N/A	N/A	18 04	Gravel Area, South of Unit 14, Building 906 Waste Storage Facility	Characterize soil, remediate soil as necessary
N/A	N/A	21	Concrete Slabs – Building 788	Remove concrete, characterize concrete and soil, remediate soil as necessary
<b>Interim Status Units</b>				
N/A	N/A	18 01	Concrete Pad Associated with Remedial Action Decontamination Pad (RADP) Tanks	Remove concrete, characterize concrete and soil, remediate soil as necessary
N/A	N/A	48	Former Pondcrete Pump House Concrete Slab 308-A	Remove concrete, characterize concrete and soil, remediate soil as necessary

The NPWL pipes and valve vaults are part of RCRA Unit 374 3 Closure of waste storage units within buildings is the responsibility of the decommissioning staff Closure of the NPWL not inside buildings is the responsibility of ER

The NPWL (Figure 17) consists of pipelines, tanks, and valve vaults The NPWL transports LL aqueous waste to the liquid waste treatment facility in Building 374 Based on Site utility maps, it is estimated there is approximately 6,300 ft of pipeline

RCRA-regulated waste is currently stored at the 750 Pad (IHSS Group 700-8), 904 Pad (IHSS Group 900-3), asphalt pads east of Building 551, PACS 1 and the Remedial Action Decontamination Pad (RADP), concrete slabs at Building 788, and the Pondcrete Pump House, as well as the gravel area south of the Building 906 Waste Storage Facility The waste management organization is responsible for removing the waste at these units ER staff is responsible for characterizing and remediating asphalt, concrete, soil, and debris beneath the units

The ER RSOP will be used to document what remediation was completed to support RCRA permit modification. Remediation actions related to waste storage units and NPWL and associated tanks (in IHSSs, PACs, or under buildings) will be tracked. The strategy is to remediate RCRA-regulated tanks and sections of the NPWL associated with UBC sites and other IHSSs when those sites are remediated, archive the data, and close the RCRA units when remediation of the units is complete. As tanks and sections of the NPWL are remediated, the specifics will be documented in the annual updates to the HRR.

### **Closure of RCRA-Regulated Units**

RCRA-regulated units governed by this RSOP will be closed in compliance with the closure performance standards described in this section. Unit-specific closure information, in the form of drawings and/or photographs of the unit or units to be closed, a description of the unit boundaries, applicable EPA waste codes, the selected closure option, and disposition of waste generated as a result of unit closure will be included with the Notification. This unit-specific information, combined with the closure performance information provided in the following paragraphs, will serve as the closure description document for units closed under this RSOP.

Portions of a RCRA-regulated unit may be removed prior to submittal of the required unit-specific closure information through the consultative process and concurrence of CDPHE. In such cases, LRA concurrence will be documented in an RFETS Regulatory Contact Record, a copy of which will be placed in the project-specific AR file.

Decommissioning will close RCRA-regulated units located within RFETS buildings prior to facility demolition. Decommissioning personnel will convert portions of units located beneath the building slabs or outside the building footprints (e.g., the valve vaults and underground piping associated with the Building 374 process waste system) to a RCRA-stable configuration in accordance with the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities (DOE 2001c). RCRA-stable configuration is the first step toward closure of permitted or interim status units, whereby waste is removed from the unit and the possibility of future waste input is eliminated. For tank systems, this means the tank and its ancillary equipment have been drained to the maximum extent possible using readily available means, with the objective of achieving less than 1 percent holdup, and with no significant sludge or risk remaining. Physical means, such as lock out/tag out or blank flanges, must then be used to ensure wastes will not be reintroduced to the system. RCRA-stable requirements are defined in Part X of the Site's RCRA Part B Permit (CDPHE 1997).

### **Closure Options**

Closure options for RCRA units include clean closure, removal according to the debris rule, removal without decontamination, and in-situ stabilization. These options are described below.

#### **Clean Closure**

RCRA-regulated units may be clean closed by documenting the absence of contamination or by decontaminating the unit.

**Clean Closure Option #1** For units having a complete, detailed operating history, clean closure will be demonstrated when the LRA agrees the following criteria are met

- A review of the RCRA Operating Record and building files indicates hazardous or mixed waste was never spilled in the unit, or complete documentation exists to demonstrate releases were adequately cleaned up (e.g., if a spill did occur, visible residual liquids and solid wastes were removed and the spill area was decontaminated), and
- A visual inspection of the unit and associated ancillary equipment notes the absence of hazardous or mixed waste stains and/or residuals

**Clean Closure Option #2** Units to be clean closed by chemical decontamination will be flushed and washed with a suitable decontamination solution to remove visible waste residuals and COCs, then rinsed with clean water. The final rinsate will be tested to determine whether

- The pH of the rinsate is between 6 and 9, and
- The concentrations of priority pollutants (those managed in the unit) and heavy metals are below the RFCA Tier II ALs for groundwater, as defined in Attachment 5 of RFCA. Rinsate meeting the RFCA Tier II groundwater ALs for listed waste constituents associated with the unit and the Land Disposal Restriction (LDR) standards for characteristic waste (as required for disposal) will be considered "no longer contained in" and will be managed as nonhazardous waste

The final rinsate will not exceed a volume of 2 gallons per 100 square feet (ft<sup>2</sup>) of surface area rinsed, and for internal surfaces, such as tank systems, the final rinsate will not exceed a volume of 5 percent of the capacity of the system. If test results indicate the standard has been met, the unit will be considered clean closed. Units that cannot be decontaminated to meet the performance standard will be removed prior to building demolition and managed as hazardous or mixed waste. Rinsates and wastewater will be treated onsite if appropriate facilities are available or disposed offsite at a K-H-approved facility.

#### ***Unit Removal in Conjunction With "Debris Rule" Treatment***

Alternatively, RCRA-regulated units may be closed by removal and treatment according to the "debris rule." The debris rule applies to unit equipment or structures that have no intended use or reuse, and are slated for removal and discard. To meet the debris rule standard, decontamination is conducted using any of the extraction or destruction technologies identified in Part 268 45 of 6 Code of Colorado Regulations (CCR) 1007-3 (Table 1, Alternative Treatment Standards for Hazardous Debris).

If, after treatment, ER personnel determine the equipment or structure meets the standard for a clean debris surface and it does not exhibit a hazardous waste characteristic, it will no longer be considered a hazardous waste and will be managed as a solid waste. A "clean debris surface" is defined as a "surface that, when viewed without magnification, is free of all visible contaminated soil or hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discolorations, and soil and waste in cracks, crevices, and pits

may be present provided that such staining and soil and waste in cracks, crevices, and pits is limited to no more than 5 percent of each square inch of surface area" (6 CCR 1007-3, Part 268.45)

In the event the standard is not met, the equipment or structure will be removed and managed as hazardous or mixed remediation waste. Treatment residuals generated from extraction and/or destruction technologies used in the closure of RCRA-regulated units will be characterized in compliance with 6 CCR 1007-3, Part 262.11, managed onsite in accordance with substantive ARARs (Section 5.1.3), and dispositioned offsite.

#### ***Unit Removal Without Onsite Treatment***

RCRA units that are not decontaminated to meet the clean closure standard or debris rule standard may be removed, size-reduced (if necessary), and packaged for offsite disposal. After the waste is shipped offsite, it may be stabilized or treated to meet regulatory or receiver site requirements. In the event this waste cannot be immediately shipped directly to an offsite facility, it will be stored in accordance with substantive ARARs (Section 5.1.3), and dispositioned offsite.

#### **Closure Documentation**

A closure certification will be prepared for each RCRA unit by compliance staff. The closure certification will be submitted to CDPHE for review and concurrence within 60 days after completion of the associated closure activities.

RCRA unit closure activities will be documented in the Closeout Report. Upon final closure of each RCRA-regulated unit, the Site's Master List of RCRA Units will be updated to reflect the new closure status of the unit, and the unit will be removed from the RCRA Part A and Part B Permits in accordance with the applicable hazardous waste regulations (6 CCR 1007-3, Section 100.63, Permit Modification at the Request of the Permittee).

#### **6.5.4 Original Process Waste Lines, Sanitary Sewer System, and Storm Drains**

The remediation strategy for OPWL, the sanitary sewer system, and storm drains is to remove soil contaminated above agreed-upon cleanup levels and associated pipelines, and leave in place those segments with soil concentrations below agreed-upon cleanup levels. There may be cases where soil contaminated above agreed-upon cleanup levels and associated pipelines will not be excavated but may require a different action. In these cases, a separate decision document will be required.

#### **Original Process Waste Lines**

The OPWL, shown on Figures 18 and 19-A through 19-F, is a network of tanks, underground pipelines, and aboveground pipelines used to transport and temporarily store aqueous chemical and radioactive process wastes. The OPWL potentially transported a variety of wastes, including acids, bases, solvents, radionuclides, metals, oils, PCBs, biohazards, paints, and other chemicals (DOE 1992).

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**Figure 18:  
Original Process Waste Lines**

**January 8, 2002**

**Map ID: Draft**

**CERCLA Administrative Record document, SW - A - 004453**

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**Figure 19-A:  
Original Process Waste Lines**

**January 8, 2002**

**Map ID: Ver-2**

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**Figure 19-B:  
Original Process Waste Lines**

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**Map ID: Ver-2**

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**Figure 19-C:  
Original Process Waste Lines**

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**Map ID: Ver-2**

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**Figure 19-D:  
Original Process Waste Lines**

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**Map ID: Ver-2**

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**Figure 19-E:  
Original Process Waste Lines**

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**Figure 19-F:  
Original Process Waste Lines**

**January 8, 2002**

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The OPWL network originally consisted of approximately 35,000 ft of pipeline. Parts of the OPWL were converted to NPWL or other systems (e.g., fire plenum deluge system), and will be remediated as part of those systems. The current OPWL system contains approximately 28,638 ft of pipeline. Approximately 13,317 ft of pipeline is included in IA Group 000-2. The remaining 15,321 ft of pipeline is included in other IA Groups.

### **Sanitary Sewer System**

The sanitary sewer system (Figure 20) consists of approximately 36,480 ft of pipeline, and 25 valve vaults, pump vaults, and similar structures. This estimate includes only main pipelines. Remaining pipelines will be remediated with UBC sites or other IHSSs or PACs.

### **Storm Drains**

There are 239 storm drains at RFETS totaling approximately 79,500 ft in length. Of these, 139 are part of IA Group 000-3 (Figure 20). The remaining 100 storm drains are part of other IA Groups. Storm drains may have been exposed to contaminated liquids because of spills, fires, contaminated surface-water runoff, and contaminated sediments. Potential wastes that have been documented in storm drains are silver paints (DOE 1992).

### **Remediation Strategy**

The remediation strategy for the OPWL, sanitary sewer system, and storm drains consists of two approaches:

1. The sections of OPWL, sanitary sewers, and storm drains associated with IHSSs, PACs, and UBC sites will be remediated along with the respective IHSS Groups. Additionally, sections of pipeline adjacent to or close to an IHSS, PAC, or UBC site will also be included with the IHSS Group remediations wherever possible. This approach will reduce mobilization and operating costs and schedules. Pipeline segments that will be included with IHSS Groups will be documented in the appropriate Notification.
2. Remaining sections of contaminated soil and associated OPWL, sanitary sewers, and storm drains will be remediated as infrastructure constraints are eliminated or reduced.

### **Decommissioning Responsibilities**

Decommissioning staff will remove all OPWL, sanitary sewers, and storm drains within 3 ft of the existing grade within a building footprint or to the nearest junction. All remaining pipelines will be cut off at the building footprint boundary, or the nearest junction outside the building footprint, and sealed with a watertight permanent seal. Pipeline termination points will be surveyed using traditional or Global Positioning System (GPS) surveying methods. Decommissioning staff will provide a map of all pipeline and other utility terminations to ER.

### **Environmental Restoration Responsibilities**

Soil surrounding pipelines contaminated above agreed-upon cleanup levels will be excavated, treated as necessary, and disposed offsite. Pipelines associated with contaminated soil will also be excavated. Subsurface soil requiring remediation will be excavated with heavy machinery, including backhoes, front-end loaders, bulldozers, or vacuum systems. Cranes and other lifting equipment will be used for pipeline removal as necessary. All efforts will be made to eliminate confined space entries. Engineering and administrative controls will be implemented prior to and during excavation activities to control the spread of radiological and hazardous contamination in accordance with job-specific work control documents.

Excavated soil and pipelines will be segregated by size, material type, and waste type. Soil and pipelines will be evaluated to determine whether treatment is required to meet regulatory requirements and will be characterized in accordance with requirements described in Section 10.0. Soil and pipelines that do not require treatment will be transferred to rollofs or other waste containers and transferred to the waste management organization for storage and subsequent transportation to a disposal facility. Soil that does require treatment to meet regulatory requirements will be stabilized or treated, then transferred to the waste management organization, managed in accordance with substantive ARARs (Section 5.1.3), and dispositioned offsite. Pipelines will be size-reduced and then transferred to the waste management organization, managed onsite according to substantive ARARs (Section 5.1.3), and dispositioned offsite. Pipelines that are left in place will be sealed and their location will be surveyed.

Based on historical information, it is anticipated that sanitary sewers and storm drains will be significantly less contaminated (if contaminated at all) than the OPWL. They currently have sewage or storm water running through them. These lines will be flushed with water to remove solids. After a thorough flushing, a final rinse will be applied and the rinse water will be analyzed. Pipelines will be grouted to eliminate potential contaminant migration pathways.

### **6.6 BUILDING FOUNDATION AND SLAB REMOVAL**

Structural materials within 3 ft of the existing ground surface will be removed during decommissioning activities, including building slabs and foundations unless otherwise required by ER staff. In the event that decommissioning of a facility with a high potential for UBC occurs well before scheduled soil remediation actions, ER staff may specify that building slabs be left in place to provide continued containment of potentially contaminated soil.

Other structures associated with slabs and foundations (e.g., sumps, source pits) that were not removed by decommissioning may be removed during remediation under this RSOP if the remediation is excavation. This may include structures below the water table or the top of bedrock.

Currently, several building slabs and foundations remain from previous decommissioning activities or will be left in place in advance of soil remediation efforts. ER staff will remove the following slabs and foundations:

- Building 123,

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- Building 889,
- Building 779,
- Building 690 Area slabs,
- Building 910 and associated slabs,
- Guard shack slabs at inner East and West Gates,
- Building 865, and
- Additional slabs, as necessary

If slabs and foundations were not characterized during decommissioning, ER will characterize them in accordance with the site procedures in consultation with the regulatory agencies. Slab and foundation characterization will be identified in the Notification. Removal will involve large mechanical equipment that may include excavators and front-end loaders to demolish, break up, segregate, and load concrete, steel, and other slab and foundation materials into waste containers or staging areas. Excavators may be equipped with the following attachments:

- Pulverizers that crush concrete and separate rebar and encased steel beams,
- Shears that sever metal, structural steel, wood, rubber, and plastic,
- Grapples that serve as an all-purpose tool for demolition and material handling, and
- Rams that demolish concrete structures

Other techniques may be considered and will be documented in the Notification. Concrete may be recycled in accordance with the RSOP for Recycling Concrete (DOE 1999d) or disposed.

## **6.7 FOUNDATION DRAINS**

Foundation drains are associated with many RFETS buildings and include footing drains, building sumps, and subdrains. Foundation drain systems were constructed to intercept and transport groundwater away from building foundations to prevent flooding of building basements. Typically, foundation drains consist of a trench or series of trenches, backfilled with gravel or other free-draining material. A slotted or perforated pipe is generally installed at the bottom of the trench.

Water collected in the foundation drains flows by gravity to an outfall at a lower elevation, while water in sumps is generally pumped to a discharge location. The intercepted water is discharged to a storm sewer, sanitary sewer, building sump, or surface outfall. RFETS foundation drains are listed in Table 7, and the locations are illustrated on Figure 21.

**Table 7**  
**Foundation Drains**

Station Identification	Description
Foundation Drain (FD)-111-1	Drain in gully outside security fence north of the northwestern corner of Building 111 halfway to Sage Avenue
Building Sump (BS)-111-2	Sump located in southeastern corner of the Building 111 basement
FD-371-1	Southeastern corner of Buildings 371/374
FD-371-2	Drain daylights in the gully southeast of the southeastern corner of Building 374
FD-371-3	East of Building 374
FD-371-4	Southwest of FD-371-3 on the western side of the access road to the 517/518 substation (buried)
FD-371-5	Northeast of the 517/518 substation (buried)
FD-371-6	Northeast of the 517/518 substation (buried)
FD-371-MC	Metal culvert near outfall FD-371-1
FD-371-COMP	Northeast of FD-371-4, -5, and -6
FD-444-1 FD-444-460	South of the southwestern corner of Building 444, renamed FD-444-460
BS-444-2	Sump inside Building 444 at the southeastern corner of the "snake pit"
FD-516-1	Southern side of the road into the 516 power substation
FD-559/561	East of Building 561, Door 1, and south of Building 559, Door 6
FD-707-1 750 Culvert	Storm drain outlet across the road from the eastern side of the 750 parking lot
BS-707-2	Sump in a pump pit between the cooling tower and Building 707
BS-707-3	Sump in the old process drain manhole outside Door 3 to Building 778
FD-771-1	Drain located approximately 50 ft southwest of the southwestern corner of the old 773 guard post
BS-771-2	Sump in Room 146, Building 771
BS-771-3	Sump in elevator pit
BS-771-4	Drain located west of FD-771-1
FD-774-1	Drain located east of Building 770
FD-774-2	Located at the northeastern corner of Building 774
FD-774-3	Located on the hillside northeast of Building 774
FD-779-1	Drain line that runs between Ponds 207C and 207A on the hillside north of the SEP
FD-790	Drain located in the manhole on the southwestern corner of Building 790
FD-850-1 FD-860-1	Drain located approximately 50 ft south of Building 860
BS-865-1	Sump in the manhole on western side of Building 865
BS-865-2	Drain located outside Door 1 of Building 865
FD-881-1	Drain on hillside south of the middle of Building 881
BS-881-2	Sump in elevator shaft by the boiler room in Building 881
BS-881-3	Sump under the stairway in the northeastern corner on the first floor of Building 881
BS-883-1, FD-883-1	Located in manhole outside Door 17 on the southwestern corner of Building 883
FD-886-1	Located at the northeastern corner of Building 875
FD-886-2	Located on the western side of Building 886
BS-887-1	Sump in the northwestern corner of the lowest section of Building 887
FD-910	Manhole on the northern side of Building 910
FD-991-1	Drain in gully east of the northeastern corner of Building 991
BS-991-2 FD-991-2	Located in the southeastern corner of the basement of Building 991

Decommissioning staff will remove all foundation drains if they are within 3 ft of the existing grade within a building footprint or to the nearest junction. All remaining drains will be cut off at the building footprint boundary, or the nearest junction outside the building footprint, and sealed with a watertight permanent seal. Drain termination points will be surveyed using traditional or GPS surveying methods. Decommissioning staff will provide a map of all foundation drain terminations to ER.

Accessible foundation drains, associated building sumps, surface outfalls, and surrounding drains, sumps, or outfalls with soil contamination above agreed-upon cleanup levels will be excavated. To reduce the possibility for potential residual migration through footing drain corridors, the bedding material will be excavated and replaced with compacted fill, or pressure grouted. Associated storm drains and sanitary sewers will be addressed as discussed in Section 6.5.4.

## **6.8 UNDERGROUND STORAGE TANKS**

Underground storage tanks (USTs) at RFETS include petroleum, water, and empty hazardous waste tanks. Existing records will be reviewed to identify the location of all known tanks and the type(s) of materials they contain or contained. Tanks that contained hazardous constituents should be associated with the NPWL and OPWL, and will be remediated in accordance with Section 6.5.3 or 6.5.4, respectively. Water tanks will be drained and either removed or filled with an inert solid material, such as sand or foam.

The Colorado Department of Labor and Employment, Oil Inspection Section (7 CCR 1101-14) regulates the closure of petroleum USTs. Assessment will consist of one Geoprobe® sample collected on each side of each tank, as close to the tank as possible and in the backfill, if accessible. The Geoprobe® will be driven at least to the bottom of the original trench for each tank. One soil sample will be collected at the bottom of the fill, or at an equivalent depth if outside the backfill, or 1 ft above the groundwater (if present above the bottom of the fill material). Soil and groundwater samples will be analyzed for total petroleum hydrocarbons (TPH). Tanks with sample results below 5,000 parts per million (ppm) TPH will be closed in place.

In accordance with Attachment 13 of RFCA, the Site's 20 petroleum USTs have been drained and filled with polyurethane foam. Although soil and groundwater samples from the required site assessment met the 5,000 ppm TPH standard (DOE 1997c, Safe Sites of Colorado 1996), the data will be reviewed during ER characterization IASAP addenda activities to determine whether this information is sufficient to support a decision to close the tanks in place, or whether additional information is required to make this decision. If additional characterization and/or remediation is indicated, it will be conducted in accordance with the IASAP (DOE 2001b) and the following:

- The Oil Inspection Section will be notified within 10 days before closure of the tank system.
- When UST remediation is required, a Notification will be sent to the LRA in lieu of a PAM. Accelerated action decisions will be conducted as part of the consultative process.

## **6.9 PREVIOUSLY UNIDENTIFIED CONTAMINATION**

Areas outside of IHSSs, PACs, and UBC sites that may require remediation may be discovered during Site characterization, remediation, construction, decommissioning, and other Site activities. When new areas requiring remediation are found, these areas will be addressed in accordance with the IASAP (DOE 2001b), Draft Final BZSAP (DOE 2002), and this RSOP.

Areas requiring remediation that are identified during ER characterization or remediation of IHSS Groups will result in extension of the AOC and will not require additional administrative paperwork. The expanded AOC will be documented in the Closeout Report.

When potential areas are identified by other sources (construction or decommissioning), analytical data from the area will be compared to RFCA Tier II ALs or agreed-upon cleanup levels. Areas with soil contamination above RFCA Tier II ALs or agreed-upon cleanup levels will trigger further evaluation in accordance with RFCA Attachment 4, Environmental Ranking, RFCA Attachment 6, No Action/No Further Action/No Further Remedial Action Decision Criteria for Rocky Flats Environmental Technology Site (DOE et al. 1996), Appendix 3 of the IGD (DOE et al. 1999), the IASAP (DOE 2001b), and the Draft Final BZSAP (DOE 2002).

If a new area is identified, a PAC number will be assigned and the PAC will be added to the HRR. An IASAP or BZSAP addendum will be prepared and forwarded to the regulatory agencies. The area will be characterized in accordance with the IASAP (DOE 2001b), Draft Final BZSAP (DOE 2002), and this RSOP. After characterization, an accelerated action decision will be made. If remediation is required, a notification of the remediation target will be sent to the LRA. Areas will be remediated, if necessary, in accordance with methods in this RSOP. If a different remedy is required (i.e., groundwater remediation), it will be covered under a separate decision document. The Closeout Report will describe characterization and remediation activities and results.

## **6.10 CONFIRMATION SAMPLING**

Post-remediation confirmation sampling will be conducted at AOCs associated with IHSSs, PACs, and UBC sites. In-process soil samples will be collected and analyzed during remediation to verify cleanup below remediation goals. Post-remediation confirmation samples will also be collected and analyzed. The combination of in-process and confirmation samples will ensure residual contamination levels are below remediation goals. Confirmation sampling procedures are described in the IASAP (DOE 2001b) and Draft Final BZSAP (DOE 2002).

## **6.11 BACKFILLING**

Remediated areas requiring backfill will not be backfilled until confirmation sampling indicates remediation goals have been achieved. Processing and placement requirements will be established based on the design requirements for the backfill, as defined in the appropriate project work control documents. To ensure the backfill quality meets compaction requirements, the backfill will be geotechnically tested, as necessary, prior to placement and during backfill operations. After placement of the backfill, soil will be placed on top of the backfill to ensure

the backfilled areas blend in with the surrounding topography and support vegetation. The depth and specifications of this layer will be addressed in the final site configuration and remedy documentation.

The three potential backfill materials considered are

- Recycled concrete (in deep basements),
- Onsite soil, and
- Offsite soil

### 6.11.1 Recycled Concrete

The RSOP for Recycling Concrete (DOE 1999d) addresses the post-demolition disposition and placement of concrete. Table 8 lists the concrete free release limits (DOE 1999d). Concrete below the free release limits is considered nonradioactive, nonhazardous, non-beryllium-contaminated, and non-TSCA regulated. Each decommissioning or remediation project that generates concrete for recycling must demonstrate that the free release thresholds are met. Concrete available for recycling will be stockpiled as specified in the RSOP for Concrete Recycling (DOE 1999d).

**Table 8**  
**Concrete Free Release Limits Summary**

Contaminant	Requirement Source	Unrestricted Release Threshold		
		Total Average disintegrations per minute (dpm)/100 cm <sup>2</sup>	Total Maximum dpm/100 cm <sup>2</sup>	Removable dpm/100 cm <sup>2</sup>
<b>Radionuclides</b>				
Transuranics	DOE Order 5400.5 (DOE 1998a), Figure IV-1 DOE "No-Radioactivity Added" Waste Verification	100	300	20
Thorium-Natural		1,000	3,000	200
U-Natural		5,000	15,000	1,000
Beta-Gamma Emitters		5,000	15,000	1,000
Tritium		N/A	N/A	10,000
<b>Hazardous Waste</b>	6 CCR 1007-3, Parts 261 through 268	No listed hazardous waste or characteristic hazardous waste is present		
<b>Beryllium</b>	10 CFR 850.31, as interpreted by a DOE letter dated January 4, 2001	The unrestricted release limit for building materials is set at 0.2 µg/100 cm <sup>2</sup>		
<b>PCBs</b>	40 CFR 761	The release level for PCBs will be determined for each closure project based on applicable regulatory requirements		
<b>Asbestos-Containing Material (ACM)</b>	40 CFR 763 5 CCR-1001-10	No sample in a sample set representing a homogeneous medium results in a positive detection (i.e., >1 percent by volume)		

Areas proposed and selected for backfilling with recycled concrete must meet the following minimum criteria

- Backfill is required to meet the final grading requirement
- There are no impacts to surface water
- Restoration activities and verification sampling are complete, and the data have been verified and validated (DOE 1999d)

Section 8.4 of the RSOP for Concrete Recycling (DOE 1999d) specifies procedures for using concrete as backfill

It is anticipated that concrete from ER remediation will be used as backfill for deep building basements and will not be placed within 3 ft of the surface. If concrete from an ER site meets the minimum criteria listed above, the rubble stored in the recycled concrete storage areas will be processed by crushing. The final product will be a well-graded material with all particle sizes represented. The smaller particles tend to fill in the empty spaces around the larger particles, resulting in fewer voids after placement and compaction. Backfill with fewer voids has greater compaction densities, tends to handle greater surface-bearing loads, and has minimal post-placement settling. Final grain size distribution requirements and compaction specifications will be established in the appropriate work control documents (DOE 1999d).

Transport of the backfill material from the stockpile will be performed in accordance with the RSOP for Recycling Concrete (DOE 1999d). The material will be transported from the stockpile area in end-dump trucks or other appropriate vehicles and deposited in the backfill area. The loads will be covered or sprayed with water or surfactant prior to transport to minimize the potential for dust. Roads used to transport the backfill may also require dust control, such as application of surfactant or water, speed reduction, and periodic sweeping (DOE 1999d). A rubber-tired front-end loader or bulldozer will place the material into the backfill area.

#### **6.11.2 Onsite Soil**

Onsite soil from remediation excavations may be used as backfill. Onsite soil from other sources will not be removed for the purpose of backfill. Use of onsite soil as backfill will minimize transportation and air quality impacts. Excavated soil will be segregated by type and amount of residual contamination and will be staged in the IHSS, PAC, or UBC site where it originated. Excavated soil may be staged on and covered with plastic tarps to prevent air dispersion pending use as backfill. Additionally, BMPs will be used to prevent the potential spread of contaminants. When soil is returned to the site, the residual contamination will be documented in the Closeout Report and the HRR and the data records in SWD will be marked. Soil determined to be nonregulated (i.e., nonhazardous or concentrations below background plus two standard deviations) may be used as backfill material anywhere onsite. Backfill criteria, in accordance with RFCA, include the following:

- Soil below background (background plus two standard deviation) values may be used as backfill anywhere onsite

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- Soil with contaminant concentrations below Tier II ALs may be used as backfill in the IHSS, PAC, UBC site, or AOC that it came from
- Soil with contaminant concentrations above Tier II ALs and below Tier I ALs or agreed-upon cleanup levels may be used as backfill in the IHSS, PAC, UBC site, or AOC that it came from on a case-by-case basis. The case-by-case determination will take into account both ALARA and stewardship goals
- Soil treated to eliminate VOCs through thermal desorption may be returned to the IHSS, PAC, UBC site, or AOC that it came from on a case-by-case basis if radionuclide or inorganic contaminants are below Tier I ALs or agreed-upon cleanup levels

#### **6.11.3 Offsite Soil**

Offsite soil used for backfilling will be characterized to establish that it is comparable to RFETS background (background plus two standard deviations) soil values (DOE 2001b). Soil with analytical results greater than background (background plus two standard deviations) will not be used. Additionally, soil will undergo geotechnical evaluation to ensure stability requirements are met. Soil sources will be chosen from local areas to minimize transportation and air quality impacts. Efforts will be made to choose weed-free backfill material. Offsite soil will be staged onsite as necessary to ensure a consistent supply of backfill material.

#### **6.11.4 Stabilization**

Remediated areas will be stabilized, as necessary, to prevent erosion. Stabilization techniques will include grading, compaction, and revegetation. Remediated areas in the IA will be stabilized using a temporary vegetative cover. Remediated areas in the BZ will be stabilized using a permanent vegetative cover (DOE 2001d). The short-term vegetative cover will prevent erosion and weed invasion until completion of the end-state revegetation as part of the final remedy.

Topsoil will be reserved from areas that support vegetation at IHSSs and PACs. The top 18 to 24 inches of topsoil, except where the topsoil is contaminated, will be stockpiled and kept separated from the remaining overburden material. Topsoil stockpiles will be protected from windborne weed seed sources and wind erosion by covering the stockpile with tarps or a mulch-stabilizer. If topsoil is contaminated, soil will be imported from a local supplier. Efforts will be made to ensure the imported topsoil is free of weeds.

After an area has been backfilled, the subsoil will be ripped or scarified to a depth of 8 inches to relieve soil compaction before topsoil placement. Topsoil will then be placed as evenly as possible using reserved or imported soil. Care will be taken to avoid compaction of this layer.

At remediation areas in the IA, Canada Bluegrass (*Poa compressa*) or other approved seed will be applied to the topsoil by broadcast seeding at a rate of 18.0 pure live seed pounds per acre. The area will then be raked to ensure the seed is buried prior to mulching.

At remediated areas in the BZ, individual seeding instructions, including the seed mixture tailored to the location, soil type, and soil moisture conditions, will be developed and included in project work controls

Certified weed-free straw mulch, excelsior, coarse wood fiber, or hydromulch will be applied as a final step after seed placement. Straw mulch will be threshed wheat or oat straw that is free of excessive crop seed heads. Mulch may be mechanically crimped to anchor it to the soil. However, in large areas, on steep slopes, and where high winds are expected, hydromulching or overspraying with a tackifier may be necessary.

## **6.12 DECONTAMINATION**

Reusable remediation equipment will be decontaminated in accordance with OPS-FO 03, *Field Decontamination Operations*. Decontamination water generated during sampling will be managed in accordance with OPS-PRO 112, *Handling of Field Decontamination Water*. Excavation equipment will be decontaminated between project locations at the Decontamination Pad in accordance with OPS-PRO 070, *Equipment Decontamination at Decontamination Facilities*.

## **6.13 CLOSEOUT REPORT**

A Closeout Report will be written for each IHSS Group remediation in accordance with RFCA and will be submitted to the regulatory agencies for approval. Additionally, each IHSS, PAC, and UBC site will be individually dispositioned through the HRR process.

The expected outline for a Closeout Report is shown below. The format may change to meet the needs of the ER Program.

- Introduction,
- Characterization Data – Will include maps and tables of characterization data,
- Remedial Action Description – Will include a description of the remediation, the rationale for the remediation, and a map of the target remediation area,
- Map of Remediation Area – Will include a map of the final remediation area,
- Confirmation Sampling Data – Will include confirmation sampling analysis data and maps, and a comparison to cleanup goals,
- Verification of Treatment Process (if applicable) – Will include a description of the treatment process and analytical results to confirm that treatment was successful,
- Deviations from the ER RSOP – Will include exceptions to the ER RSOP not covered in a modification and the reasons for the exceptions. It is anticipated that these deviations will be field changes,



- Description of Site Condition After Remediation – Will include a map of residual contamination above background plus two standard deviations, method detection limits, and Tier II ALs, if any,
- Site Reclamation – Will include a description of stabilization and revegetation activities,
- Near-term stewardship actions and long-term stewardship recommendations,
- Dates and Durations of Specific Activities (approximate) – Will include a history of major remediation activities,
- Final Disposition of Wastes – Will describe where the waste will be disposed (actual or anticipated), and
- Table of No Longer Representative Sampling Locations and Sample Numbers – Will include a list of sampling locations that have been remediated. These data will be used to mark database records so they are not used in the CRA or other Site analyses

Upon completion, the Final Closeout Report will be submitted to the LRA for approval and placed in the AR

#### **6.14 SCHEDULE**

The schedule for remediation of IA IHSS Groups is shown on Figure 22, and the schedule for remediation of BZ IHSS Groups is shown on Figure 23. These figures illustrate the 2005 Working Schedule for RFETS Closure, however, they may change based on the decommissioning schedule and characterization acceleration opportunities

**THIS TARGET SHEET REPRESENTS AN  
OVER-SIZED MAP / PLATE FOR THIS  
DOCUMENT**

**Final Environmental Restoration  
RSOP for Routine Soil Remediation  
January 2002**

**Figure 22:  
Industrial Area Schedule**

**August 2001**

**Map ID: 2k-0814**

**CERCLA Administrative Record document, SW - A - 004453**

**U S DEPARTEMENT OF ENERGY  
ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE**

**GOLDEN, COLORADO**

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**THIS TARGET SHEET REPRESENTS AN  
OVER-SIZED MAP / PLATE FOR THIS  
DOCUMENT**

**Final Environmental Restoration  
RSOP for Routine Soil Remediation  
January 2002**

**Figure 23:  
Buffer Zone Schedule**

**August 21, 2001**

**Map ID: 2k-0488**

**CERCLA Administrative Record document, SW - A - 004453**

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**GOLDEN, COLORADO**

## **7.0 ENVIRONMENTAL PROTECTION AND MONITORING**

Environmental impacts will be minimized during implementation of this RSOP by using controls and approaches designed to prevent release of contaminants to air, surface water, groundwater, and the environment. Monitoring activities will be coordinated with compliance staff. The environmental monitoring program includes routine monitoring for air, surface water, groundwater, and ecology. If additional monitoring is necessary for a given project, appropriate media-specific monitoring specifications are developed that complement environmental monitoring. Descriptions of the monitoring programs and requirements and protective measures are discussed in the following sections. Figure 24 illustrates the decision framework for environmental protection actions.

### **7.1 AIR**

Environmental remediation activities have the potential to generate total suspended particulate (TSP), particulate matter (less than 10 microns [ $PM_{10}$ ]), radionuclide, VOC, hazardous air pollutant (HAP), oxides of nitrogen ( $NO_x$ ), and carbon monoxide (CO) emissions.

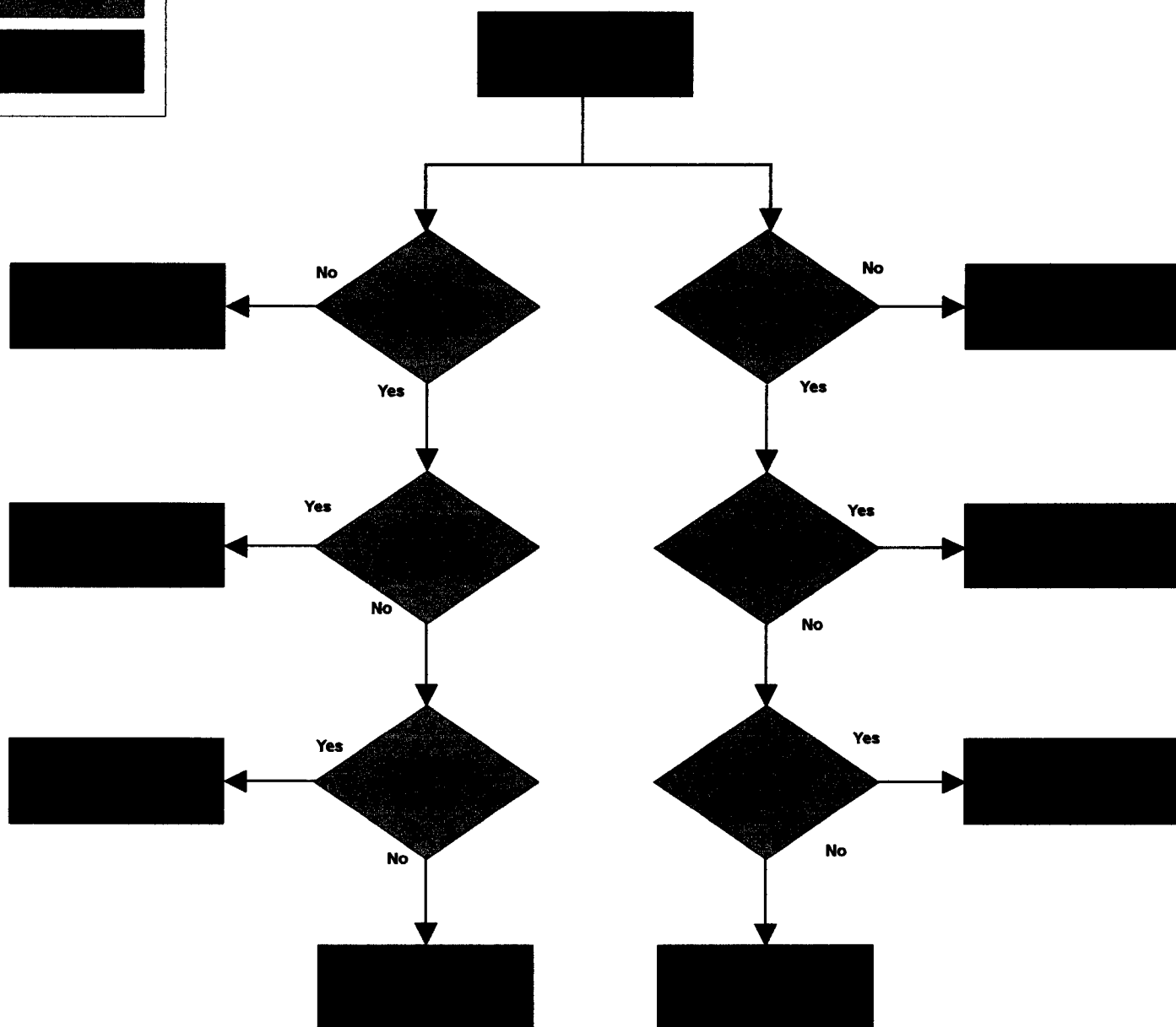
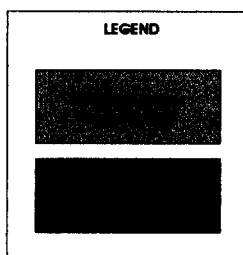
#### **7.1.1 Particulate Emissions**

Environmental remediation activities will generate dust, including TSP and  $PM_{10}$ . Opacity and particulate emission are governed by 5 CCR 1001-3, Regulation No. 1. Section III of Regulation No. 1 addresses the control of particulate emissions and requires that practical, economically reasonable, and technologically feasible work practices are used to control dust emissions. All remediation projects will need to assess the dust generation potential from activities of soil excavation, transport, and handling, and implement dust control measures accordingly.

Radionuclide emission requirements are addressed in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities (40 CFR Part 61, Subparts A and H [CCR 5 1001-10, Regulation No. 8, Part A, Subparts A and H]). This regulation requires RFETS to limit radionuclide emissions to an annual public dose (dose to an offsite member of the public) standard of 10 millirems per year (mrem/yr), monitor significant emission points, notify EPA and CDPHE prior to construction or modification of radionuclide sources with emissions exceeding a 0.1-mrem/yr effective dose equivalent (EDE) threshold, and annually report the Site's radionuclide emissions, demonstrating compliance with the 10-millirem (mrem) standard.

The existing Radioactive Ambient Air Monitoring Program (RAAMP) sampler network will be used for ambient air monitoring during environmental remediation. The RAAMP sampler network continuously monitors airborne dispersion of radioactive materials from the Site into the surrounding environment. The RAAMP network consists of 37 samplers, as shown on Figure 25. Fourteen of these samplers are deployed at the Site perimeter and used to confirm Site compliance with the 10-mrem/yr standard. Filters from the 14 perimeter RAAMP samplers are collected and analyzed monthly for U, Pu, and Am isotopes. The radiological NESHAP regulations require that an air quality assessment be conducted to evaluate potential emissions.

**Figure 24**  
**Environmental Protection Action and Decision Framework**



from planned projects. Project-specific ambient monitoring can also be triggered by soil screening measurements performed for radiation worker protection. Enhanced radionuclide ambient air sampling will be performed on an as-needed basis.

### **7.1.2 Control of Emissions**

Some combination of the following methodologies may be used to control fugitive dust:

- Controlled water spraying will be used to minimize fugitive dust emissions during environmental remediation.
- Debris, if encountered during remediation activities, will be loaded into waste rolloff containers (Section 6.5) and covered to control fugitive dust emissions.
- Environmental remediation activities will be terminated during periods of high winds, if necessary to control fugitive dust.
- Dust control devices or shrouds may be used on individual equipment.

All environmental remediation projects will establish a maximum wind velocity AL. All remediation activities will cease when the AL is exceeded. Dust will be predominantly controlled through the application of water. Depending on the location of the remediation, a water truck (or wagon) or hydrant will be used. Water will be applied in a controlled manner to manage dust without resulting in excess ponding or runoff.

Environmental remediation activities may also include operation of heavy equipment, vehicles, and similar equipment. Although emissions from equipment will not generate sufficient criteria emissions to affect National Ambient Air Quality Standards (NAAQSs), temporary stationary fossil fuel-fired equipment use (or fuel use) will need to be tracked to ensure emissions remain within permitted limits, or that appropriate notices or permit modifications are filed. In addition, opacity will be limited to below 20 percent.

## **7.2 SURFACE WATER**

Water erosion of contaminated soil during remediation could adversely impact water quality. Impacts to surface water will be controlled using standard construction methods for stormwater pollution prevention, including silt fences, berms, hay bales, diversion ditches, and BMPs. Table 9 identifies potential BMPs for construction activities that can be used as necessary. The selected controls will be coordinated with compliance staff. It is anticipated that decommissioning projects will already have surface water controls around the majority of the project areas, and only minor modifications may be necessary prior to starting remediation activities.

**Table 9**  
**Best Management Practices**

Control/Description	Primary Use	Application	Design Criteria	Limitations/Maintenance
<p><b>Interceptor Swale - A</b></p> <p>small, V-shaped or parabolic channel that collects runoff and directs it to a desired location. It can have a natural grass lining or, depending on slope and design velocity, a protective lining of erosion matting, stone, or concrete</p>	<p>To direct sediment-laden flow from disturbed areas into a controlled outlet or direct clean runoff around disturbed areas. Because a swale is easy to install during early grading operations, it can serve as the first line of defense in reducing runoff across disturbed areas. As a method of reducing runoff across the disturbed construction area, it reduces the requirements of structural measures to capture sediment from runoff because the flow is reduced. By intercepting sediment-laden flow downstream of the disturbed area, runoff can be directed into a sediment basin or other BMP for sedimentation, as opposed to long runs of silt fences, straw bales, or other filtration methods. Based on site topography, swales can be effectively used in combination with diversion dikes</p>	<p>Common applications for interceptor swales include roadway projects, site development projects with substantial offsite flow impacting the site, and sites with a large area(s) of disturbance. They can be used in conjunction with diversion dikes to intercept flows throughout the project to direct flows away from staging, storage, and fueling areas, along with specific areas of construction. Note that runoff that crosses disturbed areas or is directed into unstabilized swales must be routed into a treatment BMP, such as a sediment basin. Grass-lined swales are an effective permanent stabilization technique. The grass effectively filters both sediment and other pollutants while reducing velocity.</p>	<ul style="list-style-type: none"> <li>Maximum depth of flow in the swale may be 1.5 ft, based on a 2-year design storm peak flow. Positive overflow must be provided to accommodate larger storms.</li> <li>Side slopes of the swale will be 3:1 or flatter.</li> <li>Minimum design channel freeboard will be 6 inches.</li> <li>The minimum required channel stabilization for grades less than 2 percent and velocities less than 6 ft per second (ft/sec) may be grass, erosion control mats, or mulching. For grades in excess of 2 percent or velocities exceeding 6 ft/sec, stabilization in the form of high-velocity erosion control mats, a 3-inch layer of crushed stone, or riprap is required.</li> <li>Check dams can be used to reduce velocities in steep swales.</li> <li>Interceptor swales must be designed for flow capacity based on the Manning equation to ensure a proper channel section. Alternate channel sections may be used when properly designed and accepted.</li> <li>Consideration must be given to the possible impact any swale may have on upstream or downstream conditions.</li> <li>Swales must maintain positive grade to an acceptable outlet.</li> </ul>	<p>Interceptor swales must be stabilized quickly after excavation so they do not contribute to the erosion problem they are addressing. Swales may be unsuitable to the site conditions (too flat or steep). Flow capacity should be limited for temporary swales.</p> <p>Inspection must be made weekly and after each significant (<math>\geq 0.5</math> inch) rain event to locate and repair any damage to the channel or clear debris or other obstructions so they do not diminish flow capacity. Damage from storms or normal construction activities, such as tire ruts or disturbance of swale stabilization, should be repaired as soon as practical.</p>

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Control/Description	Primary Use	Application	Design Criteria	Limitations/Maintenance
<p><b>Diversion Dike/Berm - A</b></p> <p>Compacted soil mound, which redirects runoff to a desired location. The dike/berm is typically stabilized with natural grass for low velocities and stone or erosion control mats for higher velocities.</p>	<p>To intercept offsite flow upstream of the construction area and direct the flow around disturbed soil. It can also be used downstream of the area to direct flow into a sediment reduction device, such as a sediment basin or protected inlet. Alternatively, diversion dikes/berms can be used to contain flow within the construction site if the water is potentially contaminated. The diversion dike/berm serves the same purpose and based on the topography of the site, can be used in combination with an interceptor swale.</p>	<p>By intercepting runoff before it has the chance to cause erosion, diversion dikes/berms are very effective in reducing erosion at a reasonable cost. They are applicable to a large variety of projects, including site developments and linear projects such as roadways and pipeline construction. Diversion dikes/berms are normally used as perimeter controls for construction sites with large amounts of offsite flow from neighboring properties. Used in combination with swales, diversion dikes/berms can be quickly installed with a minimum of equipment and cost, using the swale excavation as the dike. No sediment removal technique is required if the dike is properly stabilized and runoff is intercepted prior to crossing disturbed areas.</p> <p>Significant savings in structural controls can be realized by using diversion dikes to direct sheet flow to a central area, such as a sediment basin or other sediment reduction structure if runoff crosses disturbed areas.</p>	<ul style="list-style-type: none"> <li>The maximum contributing drainage area should be 10 acres or less, depending on site conditions.</li> <li>Maximum depth of flow at the dike will be 1 ft for a 2-year design storm.</li> <li>The maximum width of the flow at the dike will be 20 ft.</li> <li>Side slopes of the diversion dike will be 3:1 or flatter.</li> <li>Minimum width of the embankment at the top will be 2 ft.</li> <li>Minimum embankment height will be 18 inches as measured from the toe of the slope on the upgrade side of the berm.</li> <li>For velocities less than 6 ft/sec, the minimum stabilization for the dike/berm and adjacent flow areas is grass, erosion control mats, or mulch. For velocities greater than 6 ft/sec, stone stabilization or high-velocity erosion control mats should be used.</li> <li>The dikes will remain in place until disturbed areas protected by the dike/berm are stabilized unless other controls are put into place to protect the disturbed area.</li> <li>The flow line at the dike will have a positive grade to drain to a controlled outlet.</li> </ul>	<p>Compacted earth dikes/berms require stabilization immediately upon placement so they do not contribute to the problem they are addressing. Diversion dikes can be a hindrance to construction equipment moving on the site; therefore, their locations must be carefully planned prior to installation.</p> <p>Dikes/berms must be inspected on a weekly basis and after each significant (&gt; 0.5 inch) rainfall to determine whether silt is building up behind the dike or erosion is occurring on the face of the dike/berm. Silt will be removed in a timely manner. If erosion is occurring on the face of the dike, the slopes of the face will either be stabilized through mulch or seeding or the slopes of the face will be reduced.</p>



Control/Description	Primary Use	Application	Design Criteria	Limitations/Maintenance
<p><b>Silt Fence</b> - Consists of geotextile fabric supported by poultry netting or other backing stretched between wooden or metal posts with the lower edge of the fabric securely embedded in soil</p> <p>The fence is typically located downstream of disturbed areas to intercept runoff in the form of sheet flow. Silt fences provide both filtration and time for sedimentation and reduce the velocity of runoff</p> <p>Properly designed silt fences are economical because they can be relocated during construction and reused on other projects</p>	<p>Normally used as perimeter control downstream of disturbed areas. They are only feasible for nonconcentrated, sheet flow conditions</p>	<p>Silt fences are an economical means to treat overland, nonconcentrated flows for all types of projects. Silt fences are used as perimeter control devices for both site developments and linear (roadway) type projects. They are most effective with coarse to silty soil types. Due to the potential of clogging, silt fences should not be used with clay soil types</p> <p>To reduce the length of silt fences, they should be placed adjacent to the downslope side of construction activities</p>	<ul style="list-style-type: none"> <li>Fences are to be constructed along a line of constant elevation (along a contour line) where possible</li> <li>Maximum slope adjacent to the fence is 1:1</li> <li>Maximum distance of flow to the silt fence should be 200 ft or less</li> <li>Maximum concentrated flow to the silt fence will be 1 cubic foot per second (cfs) per 20 ft of fence</li> <li>If 50 percent or less of soil, by weight, passes the U S Standard sieve No. 200, select the equivalent opening size to retain 85 percent of the soil</li> <li>Maximum equivalent opening size will be 70 (#70 sieve)</li> <li>Minimum equivalent opening size will be 100 (#100 sieve)</li> <li>If 85 percent or more of soil, by weight, passes the U S Standard sieve No. 200, silt fences will not be used because of potential clogging</li> <li>Sufficient room for the operation of sediment removal equipment will be provided between the silt fence and other obstructions to maintain the fence</li> <li>The ends of the fence will be turned upstream to prevent bypass of stormwater</li> </ul>	<p>Minor ponding will likely occur at the upstream side of the silt fence, resulting in minor localized flooding. Fences constructed in swales or low areas subject to concentrated flow may be overtopped, resulting in failure of the filter fence. Silt fences subject to areas of concentrated flow (waterways with flows &gt; 1 cfs) are not acceptable. Silt fences can interfere with construction operations therefore planning access routes onto the site is critical. Silt fences can fail structurally under heavy storm flows creating maintenance problems and reducing the effectiveness of the system</p> <p>Inspections should be made on a weekly basis, especially after large storm events. If the fabric becomes clogged, it should be cleaned or if necessary, replaced. Sediment should be removed when it reaches approximately one-half the height of the fence</p>

Control/Description	Primary Use	Application	Design Criteria	Limitations/Maintenance
<p><b>Straw Bale Dike - A</b></p> <p>temporary barrier constructed of straw bales anchored with wood posts, used to intercept sediment-laden runoff generated by small disturbed areas. The straw bales can serve as both a filtration device and dam/dike device to treat and redirect flow. Bales can consist of hay or straw, in which straw is defined as best quality straw from wheat, oats, or barley, and free of weed and grass seed. Hay is defined as straw that includes weed and grass seed.</p>	<p>To trap sediment-laden storm runoff from small drainage areas with relatively level grades, allowing for reduction of velocity, thereby causing sediment to settle out.</p>	<p>Straw bale dikes are used to treat flow after it leaves a disturbed area on a relatively small (1-acre) site. Due to the limited life of the straw bale, it is cost-effective for small projects of a short duration. The limited weight and strength of the straw bale make it suitable for small, flat (&lt; 2 percent slope) contributing drainage areas. Due to the problems with straw degradation and the lack of uniform quality in straw bales, their use is discouraged except for small applications.</p> <p>Straw bales can also be used as check dams for small watercourses, such as interceptor swales and borrow ditches. Due to the problems in securely anchoring the bales, only small watercourses can effectively use straw bale check dams.</p>	<ul style="list-style-type: none"> <li>• Straw bale dikes are to be constructed along a line of constant elevation (along a contour line).</li> <li>• Straw bale dikes are suitable only for treating sheet flows across grades of 2 percent or flatter.</li> <li>• Maximum contributing drainage areas will be 0.25 acre per 100 linear ft of dike.</li> <li>• Maximum distance of flow to dike should be 100 ft or less.</li> <li>• Dimensions for individual bales will be 30 inches minimum length, 18 inches minimum height, and 24 inches minimum width, and will weigh no less than 50 pounds when dry.</li> <li>• Each straw bale will be placed into an excavated trench having a depth of 4 inches and a width just wide enough to accommodate the bales themselves.</li> <li>• Straw bales will be installed in such a way that there is no space between bales to prevent seepage.</li> <li>• Individual bales will be held in place by at least two wooden stakes driven a minimum distance of 6 inches below the 4-inch excavated trench to undisturbed ground, with the first stake driven at an angle toward the previously installed bale.</li> <li>• The ends of the dike will be turned up to prevent bypass of stormwater.</li> <li>• Place bales on sides such that bindings are not burned.</li> </ul>	<p>Due to a short effective life caused by biological decomposition, straw bales must be replaced after a period of no more than 3 months. During the wet and warm seasons, however, they must be replaced more frequently as is determined by periodic inspections for structural integrity.</p> <p>Straw bale dikes are not recommended for use with concentrated flows of any kind except for small check flows in which they can serve as a check dam. The effectiveness of straw bales in reducing sediment is very limited. Improperly maintained straw bales can have a negative impact on the water quality of the runoff.</p> <p>Straw bales will be replaced if there are signs of degradation such as straw located downstream from the bales, structural deficiencies due to rotting straw in the bale, or other signs of deterioration. Sediment should be removed from behind the bales when it reaches a height of approximately 6 inches.</p>

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Impacts to surface water from environmental remediation will be monitored through the environmental monitoring program. Monitoring of activities within the IA are conducted through new source detection (NSD) and POE monitoring. NSD monitoring provides comprehensive coverage of the entire IA from permanent monitoring locations and focuses on runoff into the two main drainage areas. The NSD objective is to monitor the performance of all remediation activities within the IA with respect to their impact on surface water. POE monitoring allows assessment of RFCA AL adherence. Performance monitoring, as described in the IMP, may be implemented if a project poses a concern for contaminant release. Monitoring activities will target the contaminants of greatest concern for the action being monitored.

### **7.3 GROUNDWATER**

Several groundwater contaminant plumes were identified during previous RFI/RIs and sitewide programs. Groundwater wells, installed to monitor plume extent, are being sampled as part of the routine groundwater monitoring program. When active groundwater wells are located in IHSSs, PACs, UBC sites, or areas being remediated, compliance staff may direct or perform groundwater sampling. Performance monitoring, as described in the IMP, may be implemented if a project poses a concern for contaminant release. Monitoring locations will target the contaminants of greatest concern for the action being monitored.

### **7.4 ECOLOGY**

Environmental remediation under this RSOP may affect ecological resources. Wetlands exist in some portions of the Site, and environmental remediation activities that could impact wetlands must be reviewed prior to initiating an action. Downgradient wildlife habitat could also be damaged if soil or other eroded materials are allowed to flow into the habitats. Measures to prevent siltation, as described in Section 7.2, will be used. To minimize the possibility of adverse effects and ensure regulatory compliance is met, surveys of potential remediation sites by Site ecologists will be conducted prior to any environmental remediation activities. Animal habitats may be temporarily impacted by the environmental remediation, however, the effects will be eliminated after native vegetation is restored. If soil is left exposed for an extended period of time, additional control measures may be necessary.

## 8.0 WORKER HEALTH AND SAFETY

Remediation activities could expose workers to physical, chemical, biological, and low levels of radiological hazards. Physical hazards include those associated with excavation activities, drilling, use of heavy equipment, noise, heat stress, cold stress, and work on uneven surfaces. Physical hazards will be mitigated by appropriate use of engineering and administrative controls and personal protective equipment (PPE). Chemical hazards will be mitigated by use of PPE and administrative controls. Appropriate skin and respiratory PPE will be worn throughout the project.

Because of the anticipated contaminants, remediation activities in accordance with DOE Order 440 1A are required to follow the Occupational Safety and Health Act (OSHA) construction standard for *Hazardous Waste Operations and Emergency Response*, 29 CFR 1926.65. In accordance with this standard, H&S specifications will address the safety and health hazards of each phase of the project and specify the requirements and procedures for employee protection. In addition, the DOE Order for *Construction Project Safety and Health Management*, 5480.9A, applies to these projects. This order requires the preparation of JHAs to identify each task, hazards associated with each task, and cautions necessary to mitigate the hazards. These requirements will be integrated into the HASP wherever appropriate.

A HASP Addendum and JHA will be prepared on an IHSS Group-specific basis to identify and control potential hazards. The HASP Addendum will address both the specific hazards to be encountered and applicable guidance and requirements (e.g., OSHA), as well as specific safety equipment (e.g., hard hats and PPE) required for individual tasks. Implementation of the requirements of these documents will minimize the possibility and potential consequences of accidents and minimize physical hazards. Specific items to be covered in the HASP or HASP Addenda include the following, as applicable:

- Scope of work,
- Personnel responsibilities,
- Site information,
- Description of project-specific tasks,
- Project orientation and training requirements, including medical surveillance, required meetings, and reporting, logbook, and visitor procedures,
- Training requirements,
- PPE requirements,
- Monitoring requirements,
- Hazard assessment of biological, physical, chemical, and radiological hazards,
- Fire protection plans,

- Site access control and work zones,
- HASP bulletin board requirements,
- Sanitation requirements,
- Emergency response procedures, plans, and telephone numbers,
- Spill control procedures, and
- Recordkeeping requirements

JHAs address specific hazards associated with remediation activities, including hazards for each task step, controls to be used, special equipment requirements, training, and any necessary monitoring. No field work will be performed until a JHA has been written and approved with the exception of walkdowns, general work tasks, surveillance, inspections, and other tasks specified by the project-specific H&S Officer. The project H&S Officer, with radiological personnel, will assess the need for personnel and area monitoring.

Work activities will be stopped if any hazard is encountered or a known or potential hazard is present at a level exceeding established control limits, and appropriate notifications and mitigation of the hazard encountered will be pursued.

H&S data and controls will be continually evaluated. Field radiological screening will be conducted using radiological instruments appropriate to detect surface contamination and airborne radioactivity. As required by 10 CFR 835, *Radiation Protection of Occupational Workers*, all applicable implementing procedures will be followed to ensure protection of workers.

Potential threats to H&S for collocated workers and the general public from the release of airborne materials will be mitigated via implementation of dust suppression techniques, as described in Section 7.1. Use of controls and procedures for worker protection will also protect the public, because work control measures are designed to identify potential hazards and prevent releases (e.g., by using dust controls).

## **9.0 WORK CONTROLS**

Because the complexity of remediation projects will vary, project hold-points and criteria to accommodate varying conditions are routinely used at RFETS to prevent impacts to worker safety and the environment. Field conditions such as differences in contaminant levels and the presence of debris or pipelines may be encountered during remediation activities. Field conditions requiring work controls include incidental water, debris, or unknown utilities, elevated contamination in soil or air, and incidental spills. Emergency response, accidents, injuries, and natural disasters are described in the project-specific work controls.

Field conditions will be evaluated to determine their significance, and whether project work controls are sufficient to address specific field conditions. Based on this initial evaluation, a determination will be made whether to proceed with controls currently in place, isolate the field condition from the project activity, if it can be done safely, or pause operations to address the field condition. If a project pause is required, a revised JHA and work control documents will be prepared. After the revised JHA has been approved, work will proceed according to the appropriate control measures. Data and controls will be continually evaluated during project execution. Work controls ensure all work is performed based on an informed approach with regards to all potential hazards. The following sections describe field conditions and the corresponding response actions.

### **9.1 INCIDENTAL WATER**

Considering the shallow bedrock, groundwater conditions, and possible depth of contamination at the Site, excavations may accumulate incidental water during remediation. If incidental water is encountered, it will be sampled and managed in accordance with the Site's Incidental Water Procedure (1-C91-EPR-SW 01, *The Control and Disposition of Incidental Water*). Incidental water is defined as precipitation, surface water, groundwater, utility water, process water, or wastewater collected in one or more of the following areas:

- Excavation sites, pits, or trenches,
- Secondary containments or berms,
- Valve vaults,
- Electrical vaults,
- Steam pits or other utility pits,
- Utility manholes,
- Other natural or manmade depressions that must be dewatered, or
- Discharges from a fire suppression system that has been breached within a radiological buffer area or a contamination area

Incidental water may be sampled to determine whether it may be discharged to the environment or treatment is required. Options for water disposition may include treatment or direct discharge depending on contaminant levels in the water. Process knowledge, field pH, appearance, field nitrate, and field conductivity are the initial screening criteria. Additional sampling and analysis may be conducted when known or suspected contamination is present. These additional samples may be evaluated for gross alpha, gross beta, pH, VOCs, and metals.

Incidental water encountered as a result of stormwater or groundwater entering and collecting in an excavation will be removed if sufficient volume is present. Using a field sump, the water will be transferred to an incidental water holding tank adjacent to the area. This holding tank will be constructed with sufficient secondary containment and labeled appropriately. If the incidental water contains contaminant concentrations equal to or greater than the RFCA Surface Water Standards for Segment 5, the incidental water will be sent to an available onsite treatment facility or disposed offsite.

## **9.2 UNEXPECTED DEBRIS**

Historical data indicate unexpected debris will be encountered during remediation activities. When drums, wood, metal, plastic, rubber, fiberglass, or other debris is found during excavation activities, the following actions will be taken:

- Excavation activities will be immediately suspended and the Project Manager, Field Supervisor, Project H&S Officer, Project Environmental Manager, and Radiological Safety will be notified.
- Information regarding the debris will be gathered. This will include any labels, markings, or other visual clues as to the nature of the debris.
- Upon approval from the Project Manager or Field Supervisor, as well as the Radiological Safety Manager/Radiological Control Technician (RCT) Supervisor and H&S Officer, the debris will be removed from the excavation and placed on plastic sheeting where it can be surveyed for radiological contamination in accordance with 3-PRO-165-Radiological Safety Practices (RSP)-07 02, *Contamination Monitoring Requirements*, monitored for VOCs, and further characterized as necessary.
- After characterization, the debris will be appropriately segregated and staged for disposal.
- Based on the radiological survey, VOC monitoring results, and other characterization data, the area radiological postings, RWP, controls, and work practices will be reviewed and modified as necessary.
- Upon approval from the K-H Project Manager, excavation activities will resume.

## **9.3 UNKNOWN UTILITIES**

Some utilities installed at RFETS are not shown on existing utility drawings. When encountered during excavation work, these cannot always be readily identified by type and may create

potential hazards to workers The process for dispositioning utilities that are not adequately identified is as follows

- Suspend all excavation activities and notify the Project Manager, Field Supervisor, Project H&S Officer, Project Environmental Manager, and Site Excavation Specialists
- Review all utility drawings and contact knowledgeable building personnel to identify the possible range of utilities
- Trace lines with all available equipment and excavate where feasible
- Develop a work-around for the unknown utility, if possible
- Ensure worker safety by protecting the utility from damage
- Use infrared, radiography, and other nonintrusive techniques to obtain additional information on the utility type and conduit contents Infrared scanning devices are used by the RFETS Fire Department to determine the presence and level of liquid in pipes The Rocky Flats Bomb Squad identifies the types of utilities in plastic and metal conduits using a portable x-ray device
- Mark tested locations and identified features on the conduit
- Use tap-and-drain techniques where appropriate to collect a sample of contained fluids for analysis if the conduit contains liquid The sample results will determine the appropriate controls needed to breach the line
- Make a small opening on the side of the conduit away from the wires to allow additional testing if the conduit contains wires but not liquids, and if the wires can be adequately located
- Determine the possible hazards and hazard controls after the utility is better identified
- Develop a specific project work package, including a JHA, or revise the existing package and JHA if the utility must be breached
- Minimize the potential for spills If possible, orient the pipe to reduce the volume in the area that will be broken if liquids are suspected to be present
- Notify the Shift Supervisor prior to cutting the utility
- Upon approval from the K-H Project Manager, excavation activities will resume

#### **9.4 SOIL SURFACE FIDLER READINGS GREATER THAN 5,000 COUNTS PER MINUTE**

Field Instrument for the Detection of Low Energy Radiation (FIDLER) readings will be taken on the surface of soil removed from an excavation The ER staff uses the FIDLER to determine



whether additional work controls need to be considered. The FIDLER measures counts per minute (cpm) over an area. These values cannot be translated into pCi/g of soil. If levels greater than 5,000 cpm are detected, the following actions will be taken:

- Excavation activities will be immediately suspended and the Project Manager or Field Supervisor, Project H&S Officer, Project Environmental Manager, and Radiological Safety will be notified.
- A plastic-lined and -covered soil segregation area will be established at the excavation site for soil above 5,000 cpm.
- Based on the FIDLER readings, the area radiological postings, RWP, controls, and work practices will be reviewed and modified as necessary.
- Upon approval from the K-H Project Manager or their designee, excavation activities will resume.
- A composite sample of the segregated soil will be analyzed using a high-purity germanium (HPGe) detector. Based on the sample results, the area radiological postings, RWP, controls, and work practices will be reviewed and modified as necessary.
- Upon approval from the K-H Project Manager or their designee, the segregated soil will be managed as appropriate. Until soil is removed from the site, the segregated soil will be covered at the end of each day.

#### **9.5 PROJECT PERIMETER RADIOLOGICAL AIR SAMPLE RESULTS GREATER THAN 30 PERCENT DERIVED AIR CONCENTRATION**

To protect collocated workers in the Contaminant Reduction Zone/Radiological Buffer Zone (CRZ/RBZ) and project support zone, project perimeter, or work area, high- and low-volume air samples will be collected. A portable alpha analyzer will be used to determine whether an elevated sample result is due to naturally occurring radioactive material or radioactive COCs. If real-time results are required, a continuous air monitor will be used. If a confirmed sample result is greater than 30 percent of the derived air concentration (DAC), the following actions will be taken:

- All activities will be immediately suspended, and the Project Manager or Field Supervisor, Project H&S Officer, Project Environmental Manager, and Radiological Safety will be notified.
- Access to downwind areas will be restricted.
- All personnel in the CRZ/RBZ and support zone will be moved to a safe upwind assembly area.
- Based on sample and monitoring results, potential personal radiological exposures will be reviewed.

- Based on the sample results, the area radiological postings, RWP, controls, and work practices will be reviewed and modified as necessary
- Upon approval from the K-H Project Manager or their designee, work activities will resume

#### **9.6 EQUIPMENT RADIOLOGICAL CONTAMINATION GREATER THAN TRANSURANIC RELEASE LIMITS**

All material and equipment exiting a radiological control area at the excavation will be surveyed. In the event that survey results indicate contamination levels greater than unrestricted release limits, the following actions will be taken:

- All activities will be immediately suspended, and the Project Manager, Field Supervisor, Project H&S Officer, Project Environmental Manager, and Radiological Safety will be notified
- The source of the contamination will be identified and controlled
- The contaminated material or equipment will be contained, handled, and transferred in accordance with the RFETS Radiological Control Manual
- Based on the survey results, the area radiological postings, RWP, controls, and work practices will be reviewed and modified as necessary
- Upon approval from the K-H Project Manager or their designee, work activities will resume

#### **9.7 PROJECT PERIMETER VOLATILE ORGANIC COMPOUND MONITORING GREATER THAN BACKGROUND**

To protect collocated workers in the CRZ/RBZ and project support zone, perimeter VOC air monitoring will be conducted. If results indicate the sustained presence of VOCs at levels greater than background, the following actions will be taken:

- All activities will be immediately suspended, and the Project Manager, Field Supervisor, Project Environmental Manager, and Project H&S Officer will be notified
- All personnel in the CRZ/RBZ and support zone will be moved to a safe upwind location
- Based on monitoring results, potential personal chemical exposures will be reviewed
- Based on monitoring results, site control and work practices will be reviewed and modified as necessary
- Upon approval from the K-H Project Manager or their designee, work activities will resume

## **9.8 HAZARDOUS SUBSTANCE RELEASE**

The Site Spill Response Plan is designed to establish a program to optimize a safe response to incidental and emergency situations with the intent of protecting project personnel, collocated workers, the public, the environment, and property in the event of spills, fire, or explosion. All spills will be addressed in accordance with the Emergency Response and Spill Control Program. If applicable, reporting will be conducted in accordance with the Administrative Procedures Manual, 1-D97-ADM-16 01 (*Occurrence Reporting Process*), the Chemical Management Manual, and regulatory reporting requirements.

### **9.8.1 Incidental Spills**

Incidental spills are those where the substance can be safely absorbed, neutralized, or otherwise controlled by employees in the immediate release area at the time of the release. In addition, the release does not have the potential to become an emergency within a short time frame.

Spills considered incidental include the following:

- Gasoline, diesel, or hydraulic oil spills,
- Contaminated soil spills outside the Exclusion Zone/Soil Containment Area (EZ/SCA), and
- Decontamination or incidental water spills inside secondary containments.

Criteria that must be met prior to incidental release response actions at the project site include:

- The Project Manager, Field Supervisor, Project Environmental Manager, and Project H&S Officer must be notified, and Radiological Safety must also be notified if the spill involves radiological material.
- Chemical hazards of the substance spilled are known and quantified.
- Standard PPE will provide adequate personal protection.
- Decontamination methods are suitable for the substance spilled.
- All materials or equipment used during the response are compatible with the substance spilled.

Post-incidental spill response includes:

- Ensuring proper reporting in accordance with HSP-21 04, ADM-16 01 and the Chemical Management Manual, and
- Conducting a briefing to address the cause of the spill, methods of preventing future spills, and ways to improve readiness and response.

## **10.0 WASTE MANAGEMENT**

This section describes the management of contaminated soil and debris remediation waste, as well as wastewater that may be generated during remediation. Soil and debris remediation waste will be disposed offsite with or without prior treatment or may be used onsite if treated soil meets backfill criteria. Wastewater will be contained, characterized, and treated as necessary. All waste will be managed in accordance with RFETS policies, procedures, and substantive ARARs, and will generally be consistent with protocols in the Asphalt and Soil Management RSOP (DOE 2001e) as necessary.

### **10.1 WASTE TYPES**

Potential remediation waste types include nonroutine sanitary, LL, TRU, hazardous, LLM and TRU mixed waste, PCB and low-level PCB wastes, and friable asbestos-containing material (ACM) and LL ACM wastes.

#### **10.1.1 Soil and Debris**

During remediation, contaminated soil and debris will be excavated, and characterized and managed appropriately for the type of waste it represents based on its chemical, physical, and radiological constituents.

##### **Nonroutine Sanitary Waste**

Uncontaminated debris, including nonfriable asbestos, generated during remediation activities is managed as nonroutine sanitary waste. Radiological Engineering will perform a waste release evaluation (WRE) in accordance with PRO-141-RSP-09 01, *Unrestricted Release of Property, Material, Equipment, and Waste*, to ensure the waste meets unrestricted release limits.

##### **Low-Level Waste and Low-Level Mixed Waste**

LL waste is defined as radioactive waste that is not classified as high-level waste, TRU waste, spent nuclear fuel, or by-product material as defined by DOE Order 435.1, *Radioactive Waste Management*. The activity of radionuclides in LL waste is less than 100 nanocuries per gram (nCi/g), with no specific minimum level of activity. LL mixed waste is LL waste that also contains RCRA hazardous constituents.

##### **TRU Waste and TRU Mixed Waste**

TRU waste is radioactive waste that is not defined as high-level waste and contains alpha-emitting TRU radionuclides with atomic numbers greater than 92 and half-lives greater than 20 years with activities greater than 100 nCi/g. TRU mixed waste is TRU waste that also contains RCRA hazardous waste.

### **Hazardous Waste**

Excavated soil and debris will be characterized in accordance with regulatory requirements (40 CFR 261 and 6 CCR 1007-3, Part 261) Soil and debris characterized as RCRA hazardous contain a hazardous waste listed in Subpart D of Part 261 or exhibit a characteristic of hazardous waste as defined in Subpart C of Part 261

A hazardous waste cannot be radiologically contaminated (or it is considered mixed waste) Soil will require radiological characterization in accordance with 3-PRO-140-RSP-09 03, *Unrestricted Release of Bulk or Volume Material* Debris will be characterized in accordance with 3-PRO-141-RSP-09 01, and must meet the unrestricted release limits

### **PCB and Low-Level PCB Waste**

Soil and debris containing PCBs as a result of a spill, release, or other unauthorized disposal may be PCB remediation waste as defined by TSCA and the promulgated regulations in 40 CFR 761 The waste may be classified as LL PCB or TRU PCB remediation waste, depending on the types and activities of radionuclides present PCB remediation waste may also be contaminated with RCRA constituents

### **Friable Asbestos-Containing Material**

Friable ACM is any material that contains more than 1 percent asbestos and, when dry, may be crumbled, pulverized, or reduced to a powder by hand pressure The RFETS Industrial Hygiene organization is responsible for making friability determinations for ACM As with PCB remediation waste, ACM may be LL or TRU, depending on the types and activities of radionuclides present

#### **10.1.2 Wastewater**

Wastewater may be generated by dewatering groundwater and surface water accumulation in excavations or detention ponds The wastewater could contain hazardous constituents and/or radionuclides

## **10.2 ONSITE MANAGEMENT AND TREATMENT**

Soil and debris remediation waste will be placed into rolloffs or other waste containers to prevent erosion and runoff Alternatively, remediation waste may be stockpiled in the project area in a covered, bermed area, as necessary Remediation waste will be stored in the project area until the waste is treated onsite, or transferred from the project area to a K-H-approved offsite treatment or disposal facility or an interim storage area prior to offsite shipment Remediation waste will be managed onsite in accordance with substantive ARARs (Section 5 1 3)

### **10.2.1 Waste Storage Requirements**

Hazardous remediation waste will be managed in accordance with the requirements of 6 CCR 1007-3, Part 264, Subpart I, *Use and Management of Containers*, or stockpiled to ensure the safe and appropriate management of this type of waste Waste handling and storage during

remediation will meet the substantive requirements of 6 CCR 1007-3, 264 553 and 6 CCR 1007-3, Part 264, Subpart I. Storage of PCB remediation waste will meet the applicable, substantive requirements of 40 CFR Part 761. Waste handling and storage of friable ACM will meet the applicable substantive requirements of 6 CCR 101, Regulation 8, Part B.

### **10.2.2 Waste Treatment Requirements**

Contaminated soil may be treated onsite using low-temperature thermal desorption if the treated waste is expected to meet criteria for onsite backfill. In this case the treatment unit will be established as a miscellaneous unit, managed pursuant to the substantive requirements of 6 CCR 1007-3, Part 264, Subpart X. Environmental evaluations required by Subpart X status, such as surface soil, geology, and hydrology, are contained in previously prepared RFI/RI reports. Operation of a miscellaneous unit will be conducted in accordance with the substantive requirements of 6 CCR 1007-3, Part 264, Subparts AA and BB, *Air Emissions Standards for Process Vents and Air Emissions Standards for Equipment Leaks*. The substantive requirements of 6 CCR 1007-3, Part 265, Subpart P, *Thermal Treatment*, will be incorporated to provide operating parameters appropriate for treatment using thermal desorption technology.

## **10.3 OFFSITE TREATMENT OR DISPOSAL**

Remediation waste generated at RFETS and destined for offsite treatment or disposal will be managed onsite in accordance with substantive ARARs (Section 5.1.3). This includes nonroutine sanitary wastes (e.g., trash and debris suitable for disposal in a sanitary landfill). The overall waste characterization, generation, and packaging process for the waste is specified in the *Low-Level/Low-Level Mixed Waste Management Plan*, 94-RWP/EWQA-0014. The waste classification of contaminated soil and debris will determine the type of receiver site and treatment (if any) required.

### **10.3.1 Nonroutine Sanitary Waste**

Nonroutine sanitary waste will be disposed in K-H-approved sanitary landfills. Nonroutine sanitary waste will be characterized and managed in accordance with 1-PRO-573-SWODP, *Sanitary Waste Offsite Disposal Procedure*. Critical to characterization is the WRE, indicating the waste meets RFETS unrestricted release limits. The waste must also be free of prohibited items as defined by receiver site requirements.

### **10.3.2 Low-Level Waste**

LL waste will be treated and/or disposed at a K-H-approved LL waste disposal facility. Excavated soil from each project area will be collected and analyzed to demonstrate it is LL and does not contain hazardous waste. Debris with surface contamination will be characterized as surface-contaminated objects (SCOs) in accordance with PRO-267-RSP-09 05, *Radiological Characterization for Surface Contaminated Objects*. The SCO characterization is required to demonstrate compliance with DOT regulations in 49 CFR 173 and regulatory requirements.

### **10.3.3 TRU Waste**

TRU waste will be disposed at the Waste Isolation Pilot Plant (WIPP). Chemical characterization (chemical analysis or process knowledge) of TRU waste is required. TRU waste will be packaged in accordance with TRUCON codes, which were developed to meet the TRUPACT-II transportation requirements. The TRUCON codes specify the radionuclide activity loading limits (otherwise known as wattage limits) for a given waste Item Description Code (IDC) and packaging configuration (type and number of layers of confinement).

### **10.3.4 Hazardous, Low-Level Mixed, and TRU Mixed Wastes**

Excavated soil that contains hazardous listed waste or exhibits hazardous characteristics must meet the LDR requirements of 6 CCR 1007-3, Part 268 prior to disposal. Soil with hazardous constituent concentrations 10 times the Universal Treatment Standards (6 CCR 1007-3, Part 268 48) will be treated to achieve these standards, or achieve 90 percent reduction in total hazardous constituent concentrations (or 90 percent reduction in extractable concentrations for metals) prior to disposal, whichever is least restrictive (6 CCR 1007-3, Part 268 49[c] and [d]). Treated soil that no longer contains listed waste or exhibits characteristics of hazardous waste can be disposed as nonhazardous waste or used as backfill (Section 6 11). Otherwise, the soil will be disposed in a K-H-approved hazardous waste disposal facility. Debris that is a characteristic hazardous waste will require treatment prior to land disposal (6 CCR 1007-3, Part 268 45).

The disposition of LLM remediation waste will depend on the waste characteristics. Currently, for direct disposal, characterization must show that the waste is solid, LDR-compliant, and contains radionuclides at less than 100 nCi/g activity. Samples of the excavated soil from each project area will be collected and analyzed. LLM remediation waste will be stabilized or treated offsite as necessary and disposed in a K-H-approved disposal facility. Currently, a receiver site does not exist for mixed wastes with radionuclide activities between 10 and 100 nCi/g.

### **10.3.5 Beryllium Waste**

Process knowledge will be used to identify debris that may be contaminated with beryllium. Beryllium remediation waste will be managed in accordance with 10 CFR 850. Debris contaminated with beryllium greater than 0.2 µg/100 cm<sup>2</sup> will be disposed offsite at a K-H-approved facility. Generator knowledge or analytical data will be used to identify soil contaminated with beryllium. Soil with beryllium values above RFCA ALs, as determined by analysis, will be disposed at a K-H-approved disposal facility.

### **10.3.6 PCB Waste**

Nonradiological PCB remediation waste with PCB concentrations less than 50 ppm will be disposed in a sanitary landfill in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(ii). PCB remediation waste with PCB concentrations equal to or greater than 50 ppm will be disposed at a RCRA Subtitle C facility or TSCA-permitted receiver site in accordance with 40 CFR 761.61(a)(5)(i)(B)(2)(iii). LL and TRU remediation waste with PCBs will be disposed offsite at an approved facility.

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### 10.3.7 Friable Asbestos

Friable asbestos will be managed in accordance with OSHA (29 CFR 1910 1001 and 29 CFR 1926 1101), NESHAP (40 CFR 61 Subpart M), and 40 CFR 763, *Asbestos*. In general, friable ACM will be wetted and packaged in a plastic bag not less than 6 mils in thickness, a combination of plastic bags equal to at least 6 mils in thickness, or a container lined with plastic of not less than 6 mils in thickness. Friable asbestos, LL friable asbestos, and TRU friable asbestos will be disposed at K-H-approved facilities. Nonfriable, nonradioactively contaminated ACM can be managed as nonroutine sanitary waste.

## 10.4 WASTEWATER MANAGEMENT

Remediation wastewater will largely consist of infiltrated groundwater and incident precipitation accumulation within excavations. Accumulated water that is removed will be managed in accordance with 1-C91-EPR-SW 01, *Control and Disposition of Incidental Waters*. This procedure includes instructions for the proper characterization, transfer, treatment, and discharge of the water. The project will identify the treatment and disposal process to be used for the wastewater. Contaminated water from pipeline flushing will be treated onsite if appropriate facilities are available or disposed offsite at a K-H-approved facility.

## 10.5 WASTE MINIMIZATION AND RECYCLING

Waste minimization and recycling will be integrated into the planning and management of materials generated during remediation. Unnecessary generation of wastes will be controlled using work techniques that prevent the contamination of areas and equipment, preventing unnecessary packaging, tools, and equipment from entering contaminated areas, and reusing contaminated tools and equipment, when practical.

Standard operations and processes will be evaluated for waste minimization, and suitable minimization techniques will be implemented. Property with radiological or chemical contamination may be reused or recycled onsite, offsite by other DOE facilities, or by publicly or privately owned facilities having proper authorization to take possession of the property. Recycling options that may be considered for materials generated during remediation are listed in Table 10. Materials will be recycled based on availability of appropriate recycle technologies, availability of facilities, and cost effectiveness.

**Table 10**  
**Recycling Options**

Material	Recycle Option	Comments
"Clean" scrap metal (not radioactively contaminated and not considered hazardous in accordance with RCRA)	Recycle through approved scrap metal vendors or via contract	Material must meet receiving facility's requirements and licensing requirements, if any
Nonradioactive scrap metal contaminated with beryllium	Recycle through approved commercial facility	Post-decontamination concentrations will be $< 0.2 \mu\text{g}/100 \text{ cm}^2$
Concrete rubble meeting the unrestricted release criteria	Reuse onsite as backfill	Must meet release criteria established in the RSOP for Recycling Concrete



Wiring and other electrical components meeting the unrestricted release criteria	Recycle through approved commercial recycling facility	Material must not exceed contamination types and levels identified in the receiving facility's requirements and license
Bulk plastics and glass meeting the unrestricted release criteria	Recycle through approved commercial recycling facility	Material must not exceed contamination types and levels identified in the receiving facility's requirements and license

## **11.0 QUALITY ASSURANCE**

Quality assurance (QA) requirements relevant to this RSOP are consistent with quality requirements as defined in DOE Order 414 1A, *Quality Assurance* and EPA QA/R-5, *EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations*, (1997) These requirements are also consistent with RFETS-specific quality requirements as described in the K-H Team *Quality Assurance Program*, PADC-1996-00051 (K-H 1999) Activities controlled by this RSOP are not covered under 10 CFR 830.120 (QA) unless inventories of materials, under direct control of the project, become nuclear facilities as defined in DOE Standard 1027-92 Hazardous and radiological risks to project personnel are addressed in the project's HASP or HASP Addendum The applicable quality control (QC) categories include the following

### **Management**

Quality Program,  
Training,  
Quality Improvement, and  
Documents/Records

### **Performance**

Work Processes,  
Design,  
Procurement, and  
Inspection/Acceptance Testing

### **Assessments**

Management Assessments, and  
Independent Assessments

The ER Program QAPP will discuss in detail how these criteria will be implemented The Project Manager will be in direct contact with the QA Manager to identify and correct potential quality-affecting issues Oversight of field activities will be conducted to ensure compliance with quality requirements

## **12.0 DECISION MANAGEMENT**

A variety of data types will be generated during remediation to support data analysis and reporting requirements. ER will manage analytical data so the staff can evaluate these data on a daily basis. Field analytical data will be transferred to ASD for archiving. All offsite analytical data will be managed by ASD.

Data generated during characterization and remediation will include, but not be limited to, the following:

- Sampling location data,
- Field parameters (depth, sample interval, field instrument readings, etc.), and
- Surface and subsurface soil analytical data

Data collected during these activities will meet RFETS data quality requirements and project DQOs. Characterization and remediation data will be used for the following purposes:

- Document Site characterization and remediation activities and decisions,
- Provide final characterization of all residual materials,
- Provide data for the CRA, and
- Support the CAD/ROD and post-closure monitoring

The data systems used to support characterization and remediation are in common RFETS standard platforms to facilitate integration of data and information among media, and make data easily available to users.

### **12.1 ENVIRONMENTAL RESTORATION REMEDIAL ACTION DECISION MANAGEMENT SYSTEM**

RADMS is used to generate, verify, validate, and produce maps and reports. It is also used to access and evaluate environmental data, produced within 24 to 48 hours of sample collection and analysis, during both characterization and remediation activities. Figure 26 illustrates the general data flow and system configuration.

Field and analytical data are organized in Microsoft Access and linked with a Geographic Information System (GIS), specifically ArcView, to provide users with contaminant data by geographic location and the ability to perform spatial analyses. RADMS will interface with existing site databases, including ASD and SWD, to ensure data consistency and retrievability.

ER staff will use RADMS to

- Evaluate analytical data,
- Track environmental samples/maintain chain-of-custody,
- Assess the quality of analytical results,
- Determine characterization sampling locations,
- Determine remediation areas,
- Determine confirmation sampling locations,
- Estimate risks from residual contamination,
- Track closure of RCRA units,
- Track ER waste volumes and composition, and
- Produce maps and reports

Additionally, RADMS will be available to CDPHE and EPA. ER staff will work interactively with the regulatory agencies to

- View existing data,
- Develop proposed characterization sampling locations,
- Determine remediation areas,
- Determine confirmation sampling locations, and
- Accelerate the review and approval process by working with virtual data and graphics prior to submittal of Closeout Reports

RADMS includes several modules customized for ER program decision-making. These modules include the following

- Sample tracking,
- Data analysis,
  - Data verification and validation,
  - Spatial analysis, and
  - Risk screen,
- RCRA closure,

- Waste Management, and
- Automated Reporting

#### **12.1.1 Sample Tracking**

All characterization and remediation samples will be tracked through the RADMS data collection management module. Sample tracking will be keyed to the ASD sample numbering system and will include a variety of field parameters (e.g., those currently required by ASD), as well as sample depth, test method, collection time, field QC information, etc. Chain-of-custody forms and sample labels will be printed from this module.

#### **12.1.2 Data Analysis**

Data will be analyzed through several different modules, as described below. Routine statistical, verification and validation, and spatial analysis (through graphics) will be automated. The algorithms and data analysis sequences are consistent with project DQOs. Data analysis will be performed with verified and validated data after characterization sampling is complete, and again, after remediation confirmation sampling.

#### **Verification and Validation**

All data collected during ER characterization and remediation sampling will be verified and validated in accordance with the IASAP (DOE 2001b), BZSAP (DOE 2002), and QA requirements. Verification will consist of ensuring all data received from the analytical vendor(s) are complete and correctly formatted. Validation will consist of a systematic comparison of all QC requirements with results reported by the vendor (e.g., relative to laboratory control samples, matrix spikes, matrix spike duplicates, and blanks). The verification and validation process will establish usability of the data by determining, reporting, and archiving the following criteria relative to each measurement set or batch:

- Precision,
- Accuracy,
- Bias,
- Sensitivity, and
- Completeness

#### **Spatial Analysis**

Several data aggregation and evaluation options are available in the spatial analysis module, including inverse distance weighting (IDW), kriging, Monte Carlo simulations, and other geostatistical techniques. Spatial analysis will allow determination of contaminant concentration boundaries as defined by RFCA Tier I, Tier II, agreed-upon cleanup levels, and background.

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values This analysis will also be used to determine additional sampling locations, remediation areas, and associated confidences in the values and decisions

### **Risk Screen**

The risk screening module is used to estimate whether human health risks are acceptable in remediated areas Algorithms in the risk screening module are consistent with DQOs in the Draft CRA Methodology (DOE 2000g), IASAP (DOE 2001b), and Draft Final BZSAP (DOE 2002) The risk screening module includes estimation of external and internal exposures on an IHSS Group basis

### **12.1.3 RCRA Closure**

The RCRA closure module allows a user to archive all pertinent location, analytical, and remediation information about RCRA units This will be used to track closure of sections of the NPWL and other RCRA units closed by ER

### **12.1.4 Waste Management**

Location, volume, characteristics, classification, and container type will be tracked for all ER remediation waste ER waste data will be transferred to the Site WEMS database

### **12.1.5 Automated Reporting**

RADMS is configured to produce reports from all of the customized modules Hardcopy reports will typically consist of data tables (queries), isopleth maps (e g , Tier I AL, Tier II AL, agreed-upon cleanup level, and background (background plus two standard deviations) concentration boundaries), and combinations of tables and maps tailored to specific needs Hardcopy reports will be minimized through the routine use of desktop "workstations" dedicated to specific locations and/or personnel within the project, DOE, EPA, CDPHE, and the U S Fish and Wildlife Service

### **13.0 ENVIRONMENTAL CONSEQUENCES**

Paragraph 95 of RFCA mandates incorporation of National Environmental Policy Act (NEPA) values into RFETS decision documents. This section of the RSOP addresses the environmental consequences from ER soil remediation actions, including the remediation, treatment, and disposition of contaminated soil and debris, importing of clean soil for backfilling excavations, and related actions. This section, therefore, satisfies the RFCA requirement for a "NEPA-equivalency" assessment of environmental consequences.

Emphasis in this section is on analyzing short-term impacts associated with remediation activities, and distinguishing them from long-term impacts associated with RFETS closure, including the final configuration. The analysis incorporates several previously completed documents and generally accepted assumptions to evaluate impacts in specific resource areas. Offsite transportation impacts, from implementing offsite treatment and disposal alternatives, are addressed previously in Attachment 3 to the RSOP for Facility Disposition (DOE 2000c) (for LL and LLM waste), and in the 2001 Cumulative Impacts Document (CID) Update Report (CID Update) (DOE 2001f). Offsite facilities considered for waste treatment or disposal of RFETS waste (e.g., LL, LLM, and nonradiological waste) are assumed to be in operation, to be properly licensed and permitted to provide such services, and have sufficient capacity to handle RFETS waste. In the case of another DOE facility (Nevada Test Site [NTS]), the facility is assumed to already have NEPA documentation that addresses treatment and disposal of waste from other DOE sites, including RFETS. Specific locations of local offsite treatment and soil/borrow facilities to be used for remediation activities have not yet been identified.

The remediation impact analysis relies heavily on conclusions reached in the CID (DOE 1997d) and CID Update (DOE 2001f), both of which focus on cumulative impacts resulting from onsite activities implemented through RFETS closure. In summary, remediation activities will result in adverse short-term impacts in many resource areas, including air quality, water quality, traffic congestion, and ecological resources. In many instances, the impacts could be intense for a short period of time. However, the impacts are temporary and controllable with mitigation (e.g., monitoring and BMPs). The long-term impacts of soil remediation are minor, and the benefits of removing contamination from RFETS far outweigh these impacts.

To ensure a thorough environmental compliance review of actions that will fall within the scope of the ER RSOP, an environmental review of ER RSOP actions will be conducted. Review of the action will ensure adequate consideration of environmental concerns.

#### **13.1 SOIL AND GEOLOGY**

The remediation of a substantial amount of contaminated soil will result in a long-term beneficial impact. However, in the short-term, remediation activities may require significant excavation and soil stockpiling. Potentially adverse impacts include soil disturbance, soil erosion, and subsidence (slumping). In addition, alternatives requiring offsite treatment or disposal of soil may result in substantial soil losses from RFETS.

Subsurface geology is not likely to be affected by remediation activities. Activities will result in limited disturbance of the subsurface, which will, in particular, occur during remediation of OPWL and NPWL areas. These areas have generally been previously disturbed and do not contain mineral resources.

Surface soil has been mixed, compacted, and otherwise disturbed throughout the IA. While ongoing activities will further disturb soil throughout RFETS, most activities will occur in developed areas and will affect previously disturbed soil. However, remediation of some IHSS areas will occur in the BZ.

Remediation will involve the removal of contaminated soil and backfilling excavations. To minimize further contamination of surface soil during remediation activities, the contaminated soil being removed will either be put in rolloff containers and remain at that location, or moved to a new location for temporary storage or treatment, as appropriate, prior to final disposition. The new locations may be onsite or offsite, depending on the treatment alternative selected, and will be set aside for soil with similar concentrations of the same types of constituents. Contaminated soil will not be distributed to undisturbed or "clean" areas.

Soil disturbance may result in siltation due to the large volumes of soil being moved and dispositioned. Exposed areas, especially soil found on sloped portions of RFETS, may be readily eroded and add to surface water runoff and sediment transport. Erosion will be controlled; control methods are discussed in Section 7.0.

Remediated areas will be reclaimed by backfilling, recontouring, adding topsoil, and establishing a vegetative cover for soil stabilization and weed control. In the IA, where projects must be left temporarily in an interim state until all decommissioning and remediation work is completed, this temporary vegetative cover may be needed for several years. Temporary areas will be regraded and permanently revegetated using appropriate native plant species mixtures as the last action in the final configuration.

While efforts will be made to reserve as much available "clean" soil at RFETS as possible, the extent of soil contamination is not yet fully known. Because offsite disposal of soil and debris is anticipated, RFETS may be required to import a significant volume of replacement soil (estimated at 121,718 cubic meters [ $m^3$ ], assuming all contaminated soil is taken offsite for disposal) for backfilling, recontouring, and use in revegetation.

## **13.2 AIR QUALITY**

Remediation activities, including soil excavation, equipment operation, soil treatment, and transportation, will generate air pollutants. Regulated air pollutants include criteria air pollutants (i.e., ozone, CO, NO<sub>x</sub>, sulfur dioxide, lead, and particulate matter), HAPs, and radiological air emissions. RFETS is located within the metropolitan Denver area that is designated as a "nonattainment" area with respect to NAAQS for PM<sub>10</sub>, CO, and ozone. This analysis is primarily concerned with fugitive particulate emissions and VOCs, because these are the pollutants most likely to be found in areas where soil is being excavated, transported (fugitive dust), and treated (onsite treatment for VOCs only) onsite. Engineering and administrative controls will be implemented prior to and during excavation activities to control the spread of



radiological and hazardous contamination (e.g., dust suppression with water hoses and plastic liners) in accordance with job-specific HASPs, ALARA Job Reviews, and RWPs. An estimated 121,718 m<sup>3</sup> of soil will be excavated and handled during remediation activities, requiring approximately 4,900 shipments for removal, treatment, and offsite disposal.

The pollutant most frequently generated by soil excavation and transport, and in the greatest amounts, will be fugitive dust, which includes TSP and PM<sub>10</sub>, and particulate matter 2.5 microns (PM<sub>2.5</sub>) in size. It should be noted that PM<sub>2.5</sub> has only recently been identified as a regulated air pollutant, and requirements are not yet promulgated. The CID (DOE 1997d), which identified TSP as the primary air quality concern for both onsite and offsite receptors, concluded that the estimated TSP emissions will not have a substantial impact. The CID Update (DOE 2001f) focused on TSP and PM<sub>10</sub>, and revised the original CID (DOE 1997d) analysis to incorporate three new sources (concrete crushing, pavement removal, and building demolition), as well as an accelerated closure schedule. While the updated analysis, therefore, shows that emissions will increase, the ER activities included in this RSOP, and the related impacts, will be less than those reported in the CID Update (DOE 2001f).

Dust emissions from remediation activities will be controlled with practical, economically reasonable, and technologically feasible work practices, as required by the Colorado Air Quality Control Commission (CAQCC) Regulation No. 1. Specifically, onsite dust will be controlled through dust minimization techniques, such as the use of water sprays to minimize suspension of particulates, and stopping earthmoving operations during periods of high wind. In addition, TSP and PM<sub>10</sub> (as well as other criteria pollutants) will be monitored consistent with the RFETS IMP to ensure air emissions remain within acceptable levels. Opacity rules, limiting opacity below a 20-percent standard, will also be followed. Particulate emissions will be short-term and controllable, and emissions are not expected to be above enforceable NAAQSs at the RFETS perimeter. In addition, RFETS air quality staff calculates project emissions on an ongoing basis to determine additional regulatory reporting requirements. Therefore, potential impacts to workers and the public from proposed soil disturbances will not be significant.

Remediation activities will also include operation of vehicles, heavy machinery, and other equipment that generate other criteria pollutants. Estimated concentrations of other criteria and HAPs provided in the CID (DOE 1997d) were well below the most restrictive occupational exposure limit, with the exceptions of sulfur dioxide, nitrogen dioxide, and CO, which approached 50 percent of the most restrictive occupational exposure limit. The CID (DOE 1997d) identified the primary sources of these pollutants as diesel-powered emergency generators used to supply backup power at RFETS. According to the CID Update (DOE 2001f), maximum daily emissions will remain about the same as forecast in the CID (DOE 1997d). Equipment emissions from remediation activities are expected to be substantially less than the CID (DOE 1997d) and CID Update (DOE 2001f) estimates, therefore, impacts to workers and the public are not a concern in this RSOP. In addition, temporary fossil-fuel-fired equipment use and fuel use will be tracked to ensure that emissions remain within the regulatory limits, or that appropriate notices or permit modifications are filed.

Organic air pollutants (i.e., VOCs) may be released during soil excavation. Organic air pollutants released during excavation activities were not modeled in the CID (DOE 1997d).

because of their short-term nature, the limited availability of soil concentration data, and the uncertainties in estimation. The CID Update (DOE 2001f) analysis did not project a substantial impact (or change from the CID) (DOE 1997d) regarding organic air emissions. For purposes of this RSOP, the same assumptions made in the CID (DOE 1997d) are applied to remediation activities. In addition, a bounding assumption has been made that less than 1 ton of VOCs will be emitted from excavation and soil handling activities. Based on this assumption, reasonably available control technology (RACT) will be attained without implementing specific VOC controls for soil excavation, staging, and replacement during remediation, and estimated emissions are not expected to exceed inventory reporting thresholds. If thresholds are exceeded, necessary controls specified by RFETS air quality staff will be instituted, and an Air Pollution Emission Notice (APEN) will be submitted to CDPHE. Therefore, impacts are not expected to be substantial.

Contaminated soil may be treated onsite using thermal desorption to remove VOCs. Because there is no existing treatment facility onsite, a vendor will supply a mobile unit for onsite treatment, and units will be relocated by truck to the site of waste generation. Organic contaminants will be removed from the soil within a closed system and condensed into a liquid phase. Air emission standards will be incorporated into the design of process vents associated with thermal desorption operations that will manage hazardous wastes with organic concentrations equal to or greater than 10 ppm (by weight). Because treatment will be within a closed system, volatile emissions will be limited and controlled, emissions will also be monitored. For the transfer and storage of VOCs, storage tanks and related equipment will be maintained to prevent detectable vapor loss to the maximum extent practicable.

Radiological concerns associated with dust emissions are triggered at an action level of 0.1 mrem/yr EDE to the most impacted member of the public. A 0.1 mrem/yr EDE typically warrants regulatory agency notification, and monitoring will be conducted as needed. Measures to control emissions from hazardous or radioactive areas will be identified to ensure compliance with applicable air quality regulations. These and other measures will be designed to protect the health of workers, the public, and the environment.

The CID (DOE 1997d) analysis presented radiological impacts in terms of annual doses to three receptors based on emissions from six point sources and two area sources at RFETS. Four of the six point sources included emissions from both operations and remediation activities, while emissions from the two other point sources and two area sources were a result of remediation activities only. The three receptors included a collocated worker, a maximally exposed individual at the Site boundary, and the local population within a 50-mile radius (assumed to be 2.7 million people). The annual dose for these three receptors was estimated in the CID (DOE 1997d) to be 5.3 mrem, 0.23 mrem, and 22.9 person-rem, respectively. Although the CID (DOE 1997d) did not provide sufficient detail to allow estimated doses in the CID Update (DOE 2001f) to be directly correlated to the CID (DOE 1997d), some bounding risk characterizations were derived in the CID Update (DOE 2001f). The upper-bound collocated worker dose was well within the administrative site limit of 750 mrem, exclusive of decommissioning, and the maximum exposed individual doses were substantially lower than the maximum annual allowable radiation dose of 10 mrem for a member of the public from DOE-operated nuclear

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facilities (also exclusive of decommissioning activities) These doses do not indicate a substantial radiological air quality impact from remediation activities

General air conformity studies for nonattainment and maintenance areas are performed for most federal actions that exceed threshold quantities However, CERCLA-related activities, such as the activities discussed in this RSOP, are exempted from air conformity requirements, as long as emissions meet the substantive requirements of the Prevention of Significant Deterioration (PSD) and New Source Review (NSR) permitting programs Because emissions from the activities will meet PSD/NSR requirements, general conformity needs have been met

### **13.3 WATER QUANTITY AND QUALITY**

Remediation actions will affect water resources through excavation of contaminated soil The goal of environmental remediation is to decrease the amount of contamination onsite and facilitate closure of RFETS Consequently, long-term impacts to surface water and groundwater are projected to be beneficial

Water impacts evaluated in the CID (DOE 1997d) included altering flow rates or flow paths, negative changes in floodplain capacities, and degradation of surface water quality or groundwater quality Water quantity could be affected by excavation of soil (decreasing the depth to the water table and the net rate of aquifer recharge), alteration of topography that can affect drainage pathways, and the removal and plugging of pipelines which could affect seeps and habitats Surface water quality impacts include increased surface water erosion and turbidity from excavation and stockpiling

According to the CID (DOE 1997d), large-scale excavations may impact surface water flow paths and infiltration to an extent that causes measurable localized differences in groundwater saturated thickness and flows These groundwater impacts will be most noticeable in areas of shallow depths to the water table and small, saturated thickness However, CID (DOE 1997d) conclusions for both the alluvial aquifer and the deeper aquifers are that contributions from the area to the regional groundwater basin are minimal Therefore, remediation activities are expected to have negligible impact on regional hydrogeology

Remediation activities will have the potential to adversely affect surface water quality through the release of runoff or other contaminants during excavation and soil stockpiling Soil remediation involves excavations that could cause erosion and siltation of nearby surface water However, the removal of contaminant sources is beneficial in the long term because contaminant migration to groundwater and surface water is prevented

Following excavation and other soil disturbances, the type of fill and soil management practices will also influence groundwater infiltration and surface water runoff According to the CID (DOE 1997d), excavation of contaminated soil is expected to locally increase runoff and erosion over the short term, however, the impacts should be minimal with proper mitigation Prompt revegetation of open areas, especially sloped areas, will also reduce impacts to water quality

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### **13.4 HUMAN HEALTH AND SAFETY**

Potential human health impacts to the public and collocated workers from remediation activities include fugitive dust, exposure to radioactive and hazardous materials, and traffic associated with onsite and offsite transportation of soil for treatment and disposal. Workers involved in remediation operations will also be subject to risks of operating heavy machinery, and, for some alternatives, operating treatment facilities.

As a measure of impacts to the public from remediation activities, the CID (DOE 1997d) reports the following estimated annual radiological doses from RFETS closure air emissions: maximally exposed collocated worker, 5.4 mrem, maximally exposed member of the public 0.23 mrem, and population dose, 23 person-rem. The population dose will be expected to produce 0.012 latent cancer fatalities in the region of interest with a population of 2.7 million. Because these estimates include all RFETS closure activities, impacts from activities addressed in this RSOP will be a small fraction of those reported above.

Worker radiological dose estimates for all closure activities are presented in the CID (DOE 1997d), grouped by activity and building cluster. A total worker dose of 383 rem is reported for decommissioning and remediation activities for the 371, 707, 771, 776/777, 779, 881, 886, and 991 building clusters. An additional worker dose of approximately 12 rem is predicted for miscellaneous production zones, TRU cluster, and IA and BZ decommissioning and remediation activities. The total reported dose to workers for these closure activities is approximately 395 rem. Because doses from decommissioning will dominate these exposures, remediation activities are expected to be a small fraction of the 395 rem reported in the CID (DOE 1997d).

In practice, remediation activities, which address soil with potential radiological contamination, will be subject to RFETS's radiation protection program, which includes administrative controls limiting the dose to any involved worker to a maximum of 500 mrem/yr. Doses resulting from activities addressed in this RSOP are expected to comply with this limit. In addition, worker radiation protection for these activities will be governed by the ALARA principle, which mandates that worker exposures be further minimized on a cost-effective basis, consistent with the activities being conducted.

Risks to involved workers will be dominated by standard industrial hazards associated with heavy equipment operations associated with excavation, earthmoving, and transportation equipment. A project-specific HASP Addendum and JHA will be prepared as described in Section 8.0.

Environmental impacts of transportation of LL and LLM waste from RFETS closure activities to disposal facilities is addressed in Attachment 3 of the Facility Disposition RSOP (DOE 2000c). The analysis includes transportation for disposal of all LL and LLM waste generated during RFETS closure and concluded that

“ impacts of shipping LLMW and LLW from RFETS to disposal sites on air quality, human health and safety, traffic, and environmental justice would be minimal” (DOE 2000c)

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The Facility Disposition RSOP (DOE 2000c) transportation analysis does not directly address transportation of remediation-derived soil to offsite disposal or treatment facilities. However, because remediation waste is a component of LL and LLM waste that is shipped offsite, transportation impacts are expected to be similar to those for disposal alone.

### **13.5 ECOLOGICAL RESOURCES**

Given the nature of remediation activities (e.g., earthmoving), this analysis focuses primarily on the assessment of potential physical impacts to ecological resources. The analysis of physical impacts, as taken from the CID (DOE 1997d), is based on a comparison of the location of activities to the location of ecological resources. The primary potential impacts include loss of productivity, injury or mortality, and loss or modification of habitat. In general, the CID (DOE 1997d) found impacts to ecological resources from RFETS closure to be high in the short term, but low in the long term, based on the use of adequate controls for revegetation and weed control. It should be noted that the CID (DOE 1997d) also analyzed chemical impacts to ecological resources. However, the general findings were that, based on screening-level risk characterizations, ecological components (e.g., vegetation and soil) in several source areas contained contaminants at levels that represent low or negligible risk to wildlife.

Because the majority of areas impacted by remediation activities will occur in previously disturbed areas in the IA and reclaimed grasslands, impacts on vegetation will be considered low. The disturbance to wildlife and sensitive habitats from remediation activities could be substantial, although the impacts will be short-term. Coordinating activities with RFETS ecologists to avoid or minimize disturbance to habitats (through BMPs) and successful reclamation of RFETS will result in low long-term impacts.

RFETS provides habitat for several species of concern and at least one rare plant community (i.e., xeric tall grass prairie). Special-concern species are a particular class of wildlife and plants that are of special interest at RFETS because of their protected status or rarity (as identified by the U.S. Fish and Wildlife Service, Colorado Division of Wildlife, Colorado Natural Heritage Program, and other interested groups). Rare plant communities likely include special-concern species as well as unique combinations of plants and animals. RFETS is also home to one federally listed threatened species, the Preble's meadow jumping mouse (PMJM). Remediation activities within the BZ may disturb areas supporting or potentially supporting these species. This disturbance could represent a substantial short-term physical impact to these species and their habitats. As in the IA, however, BMPs will be implemented to avoid and minimize impacts to these habitats. Particular care will be taken with the PMJM, including the implementation of special mitigation measures identified by RFETS ecologists (e.g., work shutdowns in certain areas of the BZ from spring to fall to avoid impacting the PMJM). In addition, remediation activities include reclamation of the BZ. If soil restoration is suitable for an adequate re-establishment of native plant species, and if weeds are controlled, remediation activities will ultimately result in positive impacts to RFETS's ecological resources.

Remediated areas will be reclaimed by recontouring, adding topsoil, and revegetating as necessary. All areas will be reclaimed (e.g., topsoil added and blended with mulch and fertilizer).

in accordance with revegetation procedures described in Section 6.11. Revegetation in the IA will be considered temporary until the final RFETS configuration. However, because of the size of the IA, even partial restoration will have a positive effect on plant and animal species at RFETS.

In addition to the direct physical impacts, remediation activities could also have indirect effects on RFETS's ecological resources. For example, soil erosion from disturbed areas or stockpiles could have an adverse impact on plants and animals. However, as discussed in Section 7.0, erosion control measures will be implemented.

### **13.6 CULTURAL RESOURCES**

Because the history of RFETS, including all 64 buildings within the Historic District, has been properly documented in the Historic American Engineering Record (DOE 1998b), environmental remediation activities will have no adverse effect on historic resources. This documentation meets the requirements of the Programmatic Agreement signed by the DOE RFFO, Colorado State Historic Preservation Officer, and Advisory Council on Historic Preservation.

With respect to paleontological resources, the CID (DOE 1997d) indicates rock exposures at RFETS are not fossil-bearing. Therefore, it is unlikely that remediation activities will uncover paleontological resources. Undertakings at RFETS are unlikely to result in the deterioration or loss of any substantial paleontological resources.

Prehistoric resources at RFETS, according to the CID (DOE 1997d), are not considered substantial to the region's archaeological record. Therefore, undertakings at RFETS will be unlikely to result in the deterioration or loss of prehistoric resources. Mitigation will be recommended only in the event that new prehistoric or archaeological resources are uncovered during remediation activities. Procedures for emergency treatment of archeological resources in the BZ are addressed in the Cultural Resources Management Plan (DOE 1997e).

### **13.7 VISUAL CHANGES**

Remediation activities will result in temporary and minor visual impacts during RFETS closure. However, the long-term visual changes to topography and vegetation cover resulting from remediation activities will be more notable. Remediation activities include the revegetation of soil to a native grassland appearance. In the BZ, the disturbed areas will be backfilled with clean subsoil and topsoil, regraded as necessary, and revegetated with a permanent cover using an appropriate native plant species mixture. In the IA, the vegetation cover will be temporary for interim stabilization of excavations and other areas to prevent erosion and weed invasion until completion of end-state revegetation during the final configuration. Temporary revegetation areas will be regraded and permanently revegetated using the appropriate native plant species mixture as the last action during the final configuration.

The long-term effects of restoration activities will result in a significant change in RFETS's appearance and visibility to the public (from public roads and areas around RFETS) at closure. In particular, the RFETS IA will be reclaimed to a native grassland environment. As long as erosion and noxious weeds are controlled during remediation activities, the long-term visual

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effects will be increasingly beneficial as more and more of RFETS is restored to its natural landscape and appearance

### **13.8 NOISE**

Remediation activities include a temporary increase in local noise levels from the operation of heavy equipment, operation of onsite treatment facilities, and the loading and hauling of contaminated soil for offsite treatment and disposal. The CID (DOE 1997d) found that noise levels from industrial activities within the RFETS boundary were not distinguishable from background traffic noise levels. Noise levels from onsite construction, environmental restoration, waste disposal, demolition, and other activities were not expected to be perceptible at offsite locations. Therefore, noise levels from onsite remediation activities alone are not expected to be perceptible at offsite locations.

The primary source of noise to nearby residential areas is traffic movement along local streets and state routes. Remediation activities will result in higher public noise levels due to the increased number of trips for fill and waste transport. However, the effects will be short-term, occurring intermittently during daylight hours, and lasting for several years. The CID Update (DOE 2001f) identified increased offsite traffic relative to the CID (DOE 1997d) due to the shorter closure time, but found that the additional traffic noise will not cause a doubling of noise levels. It indicated that most public reviews of traffic noise by federal and state agencies consider a doubling of sound (10 decibels or greater) to be a moderate to substantial increase. Because traffic, including truck traffic, is already prevalent along the proposed trucking routes, it was concluded in the CID Update (DOE 2001f) that the potential impact is considered low. Given that the CID (DOE 1997d) and CID Update (DOE 2001f) analyses considered offsite waste management transport (LL, LLM, and sanitary waste) and work force commuters, in addition to remediation waste transport, offsite noise impacts from remediation activities alone will be considerably less.

Conclusions in the CID Update (DOE 2001f) indicated that higher worker noise levels will result from remediation and other closure activities because of the accelerated closure schedule, however, the overall impact will be low. Therefore, the impacts from remediation activities alone will be considered even lower.

### **13.9 TRANSPORTATION**

Environmental remediation activities will produce soil waste that requires onsite transportation for treatment or interim storage, reuse of treated ("clean") RFETS soil, treatment and disposal of RFETS contaminated soil at offsite facilities, and importing of clean soil from offsite locations. Potential transportation impacts include increased air emissions, increased traffic congestion, and transportation accidents. Tailpipe emissions and airborne particulate matter generated by the anticipated truck traffic is projected to be well below regulatory standards and will not reach a level of concern. Because of stringent DOT packaging and shipping standards, cargo-related accidents will pose minimal concern to human H&S. The CID Update (DOE 2001f) analyzed traffic in terms of increased highway and road congestion resulting from RFETS-related traffic. The analysis found that, despite the accelerated schedule, onsite and offsite traffic levels will actually decrease relative to those analyzed in the CID (DOE 1997d). Scheduling shipments

during off-peak hours will further minimize the number of shipments made during morning and evening rush hours when commuters will add to the congestion

Because transportation impacts from remediation activities will be derived primarily from material shipping, they are the focus of this analysis. Current nonradiological, LL, and LLM waste volumes projected for storage and disposal between 2001 and 2006 total 121,718 m<sup>3</sup> (8,328 m<sup>3</sup> of nonradiological waste, 81,818 m<sup>3</sup> of LL waste, and 31,572 m<sup>3</sup> of LLM waste), with the highest volume in 2006 of 41,158 m<sup>3</sup>. While the waste will likely be stored onsite in rolloff containers and shipped offsite in metal crates, this analysis assumes the most conservative packaging (55-gallon drums with 25 m<sup>3</sup> to a truck). In addition, offsite treatment and disposal will result in the greatest number of trips. It is assumed that an equal number of shipments is required to import replacement soil as is used to transport the waste offsite. Given these assumptions, the projected number of shipments for LL, LLM, and hazardous waste for remediation activities is as follows:

1 Total Shipments

$$121,718 \text{ m}^3 / 25 \text{ m}^3 \text{ per shipment} = 4,870 \text{ shipments (total)}$$

$$4,870 \text{ shipments offsite} + 4,870 \text{ shipments onsite} = 9,740 \text{ shipments total}$$

2 Peak Year Shipments (2006)

$$41,168 \text{ m}^3 / 25 \text{ m}^3 \text{ per shipment} = 1,647 \text{ shipments (peak year 2006)}$$

$$1,647 \text{ shipments} + 1,647 \text{ shipments} = 3,294 \text{ shipments (peak year 2006)}$$

In comparison, the CID (DOE 1997d) projected a total of 94,480 waste shipments of LL and LLM waste alone over a 10-year period, while the CID Update (DOE 2001f) projected a reduced number of shipments (24,928 shipments of LL and LLM waste between FY00 and FY06). The CID Update (DOE 2001f) found that annual impacts on traffic will be of smaller magnitude than originally estimated in the CID (DOE 1997d), and traffic associated with RFETS operations will be eliminated earlier. The CID (DOE 1997d) noted that the effects of increased traffic entering and leaving RFETS will intensify. However, the increased materials shipments will be offset by the eventual decreases in commuter traffic. Overall, the effects were not projected to be substantial. Given that the CID Update (DOE 2001f) projected lower traffic impacts than the CID (DOE 1997d), and remediation activities will contribute only a fraction of shipments to the overall traffic levels expected on and in the vicinity of RFETS, traffic impacts from remediation activities are not expected to be substantial.

In addition to being analyzed in the CID (DOE 1997d) and CID Update (DOE 2001f), transportation of RFETS wastes has been analyzed from a NEPA perspective in the following NEPA documents: Final Waste Management Programmatic Environmental Impact Statement for Managing, Treatment, Storage, and Disposal of Radioactive and Hazardous Waste (DOE 1997f), Environmental Assessment Finding of No Significant Impact for Temporary Storage of Transuranic and Transuranic Mixed Waste (DOE 1999e), Attachment 3 of the Facility

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Disposition RSOP (DOE 2000c), and the Final Environmental Impact Statement for the Nevada Test Site and Offsite Locations in the State of Nevada (DOE 1996b). These documents analyzed impacts of offsite shipment of RFETS waste to potential treatment and disposal locations including NTS, Envirocare, and Hanford. The Facility Disposition RSOP, in particular, addressed remediation waste. These studies have found that impacts of waste shipments are small, and the shipments themselves contribute to an overall reduction of risk at RFETS.

### **13.10 SOCIOECONOMICS/ENVIRONMENTAL JUSTICE**

The primary socioeconomic factors considered in the CID (DOE 1997d) and reexamined in the CID Update (DOE 2001f) were employment, local economy, population and housing, and quality of life. Potential socioeconomic impacts from remediation activities relate primarily to the change in direct RFETS workforce and other direct employment (related to RFETS activities) during the period of performance.

The CID Update (DOE 2001f) used an assumed 1999 workforce of 5,750, which included direct employees (DOE, K-H, and the first-tier team of subcontractors) and other direct employees. The CID Update (DOE 2001f) projected a steady decline in direct RFETS employment to approximately 4,000 workers in 2004, followed by a sharper decline to 1,000 workers or less in 2006, and 0 workers at the time of RFETS closure. In comparison, ER activities will increase in 2002 and 2003 and again in 2005 and 2006 when the majority of work areas will be remediated and the largest volumes of soil will be handled. Remediation workers will represent an increasing percentage of RFETS workers as closure approaches, accounting for the highest percentage in 2006. In some respects, this contribution is positive in that it helps to offset workforce reductions in other areas, and reduces, to some extent, the significant decline in employment that will occur in the last 2 years of RFETS closure.

Overall, the impacts of remediation activities on RFETS employment are smaller in size, but are one component of the overall impacts of RFETS closure that will ultimately result in an RFETS workforce of zero by 2007. The CID (DOE 1997d) and CID Update (DOE 2001f) both identified negative short-term, localized impacts from the workforce reductions. However, they also indicated that the negative changes to RFETS employment would be counterbalanced by projected growth in other segments of the local economy. In particular, the overall socioeconomic impacts to the Denver Metropolitan Area and to Colorado are not expected to be substantial. It is also important to note that the remediation of environmental contamination, a direct result of remediation activities, will result in a positive impact to the public's perceived "quality of life."

With respect to potential environmental justice impacts, there are no minority (i.e., populations greater than 50 percent minority) or low-income neighborhoods within a 10-mile radius of RFETS (DOE 2001f). Therefore, no environmental justice impacts are anticipated from remediation activities within 10 miles of RFETS. Human health impacts from radiological and nonradiological air emissions and offsite transportation from remediation activities are addressed in Sections 13.2 and 13.9 of this RSOP. Because the level of increased risk to the maximally exposed individual was determined to be small, no adverse human health impacts are anticipated for any segment of the population, including minority and low-income populations. Therefore, no environmental justice impacts could occur.

### **13.11 CUMULATIVE EFFECTS**

The activities proposed in this RSOP support the overall mission to clean up RFETS and make it safe for future uses. The cumulative effects of this broader, sitewide effort are presented in the CID (DOE 1997d) and CID Update (DOE 2001f), which describe the short- and long-term effects from the overall cleanup mission. This section incorporates analyses from the CID Update (DOE 2001f) to identify activities and time frames that are cumulative. Potential cumulative effects from proposed remediation activities include air emissions, visual impacts, noise, and traffic impacts.

The primary focus of the CID (DOE 1997d) was on cumulative impacts resulting from onsite activities implemented through RFETS closure. Cumulative impacts result from the proposed RFETS activities and the effects of other actions taken during the same time in the same geographic area, including offsite activities, regardless of what agency or person undertakes such other action. The CID Update (DOE 2001f) analysis included updated onsite and offsite transportation requirements, as well as several new offsite activities, although the future non-DOE projects are relatively uncertain. Increased traffic congestion will be the most noticeable impact according to the CID Update (DOE 2001f), resulting from increased RFETS traffic and other planned or proposed construction projects near RFETS. Air pollutants and noise will also have adverse impacts, however, the impacts are expected to be short-term in nature, with staggered project start and completion dates. Most people will perceive a positive, long-term visual and "quality of life" benefit, as RFETS infrastructure and remediation equipment is removed, returning RFETS to a more natural appearance.

### **13.12 UNAVOIDABLE ADVERSE EFFECTS**

Some temporary adverse effects will occur as a result of remediation activities. Surface and subsurface soil conditions will change, most conditions will be improved, but some changes will be adverse. Minor quantities of pollutants may be released to the atmosphere and surface water. Workers will experience H&S risks typical of construction projects and potential chemical and radiation exposures. Noise levels will increase slightly, as will traffic and associated congestion. Most effects will be temporary, some changes to surface and subsurface soil will be permanent. Activities will be planned and executed such that no effects exceed regulatory limits. All environmental, safety, and health risks will be managed in accordance with industry practices, DOE policy, and RFETS programs.

### **13.13 SHORT-TERM USES VERSUS LONG-TERM PRODUCTIVITY**

The purpose of remediating contaminated soil at RFETS is to improve the long-term productivity of RFETS. The ultimate goal at the end-state configuration is to restore the entire IA, as well as those portions of the BZ that have been previously disturbed or contaminated, to their natural state. Remediation activities will make significant advances in reaching this goal. Specifically, they will result in the permanent restoration of the BZ to its natural state, and the temporary restoration of the IA to provide interim stabilization until final remediation of this area. Ultimately, the IA will be regraded and permanently revegetated using appropriate native plant species mixtures as the last action in the final RFETS configuration. In the long-term, the improved productivity will help to support a range of potential future uses of RFETS.

## **14.0 RECORDS DISPOSITION**

Upon completion of the public comment period for the Draft ER RSOP, comments received from the public (including the regulatory agencies), the comment responsiveness summary, and the LRA approval letter will be incorporated into the RSOP AR File, along with a copy of the approved RSOP and copies of the RFETS documents referenced in this RSOP

For each ER project that implements this RSOP, the AR File will contain the RSOP Notification, including scoping meeting minutes, unit-specific information for RCRA-regulated units undergoing closure, and the ER Final Closeout Report for the project. In addition, project-specific information, such as characterization data, project correspondence, work control documents, and other information generated as a direct result of each ER project, will be filed in the Project Record and the AR, and RCRA records and closure documents will be maintained with the RCRA Operating Record. Electronic data will be archived in SWD. Both the Project Record files and the RCRA Operating Record files will be transferred to Site Records Management upon completion of the ER Final Closeout Report for each ER project.

The following information repositories have been established to provide public access to the AR Files for the Rocky Flats Closure Project:

**EPA Region VIII**  
Superfund Records Center  
999 18th Street, Suite 500  
Denver, Colorado 80202-2466  
(303) 312-6312

**Rocky Flats Citizens Advisory Board**  
9035 Wadsworth Parkway  
Suite 2250  
Westminster, Colorado 80021  
(303) 420-7855

**CDPHE**  
Information Center, Building A  
4300 Cherry Creek Drive South  
Denver, Colorado 80220-1530  
(303) 692-2037

**DOE Rocky Flats Public Reading Room**  
Front Range Community College  
College Hill Library  
3705 West 112th Avenue  
Westminster, Colorado 80030  
(303) 469-4435

## **15.0 REFERENCES**

CDPHE, 1997, Rocky Flats Environmental Technology Site, RCRA Part B Permit # CO-97-05-30-01

DOE Order 414 1, Quality Assurance

DOE Order 435 1, Radioactive Waste Management

DOE Order 5400 1, General Environmental Protection Program

DOE Order 5400 5, Radiation Protection of the Public and the Environment

DOE, 1992, Historical Release Report, Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 1993 through 2000, Quarterly and Yearly Historical Release Report Updates, Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 1996a, Completion Report for the Source Removal at Trenches T-3 and T-4 (IHSSs 110 and 111 1), Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 1996b, Final Environmental Impact Statement for the Nevada Test Site and Offsite Locations in the State of Nevada, Las Vegas, Nevada, August

DOE, 1997a, Closeout Report for the Remediation of Individual Hazardous Substance Site 109, Ryan's Pit, Rocky Flats Environmental Technology Site, Golden, Colorado, July

DOE, 1997b, Closeout Report for the Source Removal at the Mound Site IHSS 113, Rocky Flats Environmental Technology Site, Golden, Colorado, October

DOE, 1997c, Closure Report Design-Build Underground Storage Tank Replacement Project, Rocky Flats Environmental Technology Site, Golden, Colorado, October

DOE, 1997d, Cumulative Impacts Document, Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 1997e, Cultural Resources Management Plan, Rocky Flats Environmental Technology Site

DOE, 1997f, Final Waste Management Programmatic Environmental Impact Statement for Managing, Treatment, Storage, and Disposal of Radioactive and Hazardous Waste, Washington, D C , May

DOE, 1998a, Application of Surface Contamination Guidelines for DOE Order 5400 5, April

DOE, 1998b, Historic American Engineering Record, Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 1999a, Industrial Area Characterization and Remediation Strategy, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 1999b, Air Transport and Deposition of Actinides at the Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 1999c, Closeout Report for the Source Removal at Trench 1 Site IHSS 108, Rocky Flats Environmental Technology Site, Golden, Colorado, June

DOE, 1999d, RFCA Standard Operating Protocol for Recycling Concrete, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 1999e, Environmental Assessment Finding of No Significant Impact for Temporary Storage of Transuranic and Transuranic Mixed Waste, Rocky Flats Field Office, Golden, Colorado, August

DOE, 2000a, Integrated Monitoring Plan Background Document, Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 2000b, Rocky Flats Environmental Technology Site Industrial Area Data Summary Report, Golden, Colorado, September

DOE, 2000c, RFCA Standard Operating Protocol for Facility Disposition, Rocky Flats Environmental Technology Site, Golden, Colorado, August

DOE, 2000d, Preliminary Data Quality Objectives, Industrial Area Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, July

DOE, 2000e, Report on Soil Erosion and Surface Water Sediment Transport Modeling for the Actinide Migration Evaluations at the Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 2000f, Final Report on Phase Speciation of Pu and Am for Actinide Migration Studies, Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 2000g, Draft Comprehensive Risk Assessment Methodology, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 2001a, Draft Rocky Flats Environmental Technology Site Buffer Zone Data Summary Report, Golden, Colorado, July

DOE, 2001b, Industrial Area Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado

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DOE, 2001c, RFCA Standard Operating Protocol for Facility Component Removal, Size Reduction, and Decontamination Activities, Rocky Flats Environmental Technology Site, Golden, Colorado, February

DOE, 2001d, 2001 Annual Vegetation Management Plan for the Rocky Flats Environmental Technology Site, Golden, Colorado

DOE, 2001e, Asphalt and Soil Management RSOP, Rocky Flats Environmental Technology Site, Golden, Colorado, August

DOE, 2001f, Cumulative Impacts Document Update Report, Rocky Flats Environmental Technology Site, Golden, Colorado, October

DOE, 2002, Draft Final Buffer Zone Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, January

DOE, CDPHE, and EPA, 1996, Rocky Flats Cleanup Agreement, Rocky Flats Environmental Technology Site, Golden, Colorado, July

DOE, CDPHE, EPA, Kaiser-Hill, and RMRS, 1999, Rocky Flats Cleanup Agreement, Appendix 3 RFCA Implementation Guidance Document, July

EG&G, 1992, Phase II Geologic Characterization – Data Acquisition Surface Geologic Mapping of the Rocky Flats Plant and Vicinity, Jefferson and Boulder Counties, Colorado, March

EG&G, 1995a, Geologic Characterization Report for the Rocky Flats Environmental Technology Site, Volume I of the Sitewide Geoscience Characterization Study, Golden, Colorado, March

EG&G, 1995b, Hydrogeologic Characterization Report for the Rocky Flats Environmental Technology Site, Volume II of the Sitewide Geoscience Characterization Study, Golden, Colorado, March

Gilbert, R O , 1987, Statistical Methods for Environmental Pollution Monitoring, New York Van Nostrand Reinhold

Kaiser-Hill Company, L L C , 1999, Kaiser-Hill Team Quality Assurance Program, PADC-1996-00051

Safe Sites of Colorado, 1996, Tank Closure Report Building 771, UST No 20 Rocky Flats Environmental Technology Site, Golden, Colorado, August

## Glossary

**Accelerated Action:** Accelerated actions are expedited response actions approved as a PAM, IM/IRA, or RSOP

**Accelerated Action Remediation Goals:** Accelerated action remediation goals are based on RFCA ALs as modified by stewardship and ALARA considerations

**Action Level (AL):** Numeric levels based on risk that, when exceeded, trigger an evaluation, remedial action, or management action are referred to as ALs. The ALs for surface soil were developed to be protective of human exposure under the designated land use conditions. Subsurface soil ALs for many organics were developed to be protective of groundwater. Metal and radionuclide subsurface soil ALs are equal to surface soil ALs.

**Agreed-Upon Cleanup Level:** Agreed-upon cleanup levels are cleanup levels negotiated by the RFCA Parties that may take the place of RFCA ALs.

**Analytical Services Division (ASD):** The ASD of K-H is responsible for managing offsite laboratory contracts, data validation, and archiving analytical data.

**Applicable or Relevant and Appropriate Requirements (ARARs):** ARARs are promulgated standards, requirements, criteria, or limitations that will be met during closure activities to ensure the protection of human health and the environment and the proper management of waste. A requirement under environmental laws may be either "applicable" or "relevant and appropriate."

Applicable requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal or state environmental or facility siting laws that specifically address a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site. Only those standards identified by a state in a timely manner and that are more stringent than federal requirements may be applicable (40 CFR 300.5).

Relevant and appropriate requirements are those cleanup standards, standards of control, and other substantive requirements, criteria, or limitations promulgated under federal environmental or state environmental or facility siting laws that, while not applicable to a hazardous substance, pollutant, contaminant, remedial action, location, or other circumstance at a CERCLA site, their use is well suited to the particular site. Only those standards identified by a state in a timely manner and that are more stringent than federal requirements may be applicable (40 CFR 300.5).

**Area of Concern (AOC):** An AOC is an area that has soil with concentrations greater than background plus two standard deviations for metals or radionuclides or greater than detection

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limits for organics An AOC is the area over which data will be aggregated to make accelerated action decisions

**Asbestos:** The term asbestos includes asbestiform varieties of chrysolite, amosite (cummintonite-grunerite), crocidolite, anthophyllite, tremolite, and actinolite

**Asbestos-Containing Material (ACM):** ACM is material containing more than 1 percent friable asbestos

**Closure:** In the context of RCRA/CHWA hazardous waste management units, closure means actions taken by an owner or operator of a treatment, storage, or disposal unit to discontinue operation of the unit in accordance with the performance standards specified in 6 CCR 1007, §264.11 or §265.111, as appropriate (RFCA ¶25[p])

**Closure Project Baseline:** The current baseline scheduled scope of work for RFETS is referred to as the Closure Project Baseline. It includes cost, schedule, and technical performance for activities

**Compliance Monitoring:** Compliance monitoring is the ongoing environmental monitoring of air, surface water, and groundwater conducted at RFETS in accordance with the IMP

**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA):** CERCLA, 42 U.S.C. §9601 *et seq.*, enacted in 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499, the Community Environmental Response Facilitation Act, Pub. L. No. 102-26, and the National Contingency Plan (NCP) and other implementing regulations (RFCA ¶25[m]), provides EPA with the authority to respond to releases or threatened releases of hazardous substances, pollutants, or contaminants that may endanger human health or the environment. The regulations implemented pursuant to CERCLA are defined in the NCP.

**Confidence Level:** The confidence level is the quantity  $(1-\alpha)100\%$  associated with the confidence interval. It is a quantitative measure of the limit about the true mean at a given level of probability. For example, it is the precision level at which the sample mean estimate is the population mean.

**Contamination Reduction Zone (CRZ):** The CRZ is the area at a hazardous waste site that has been set aside for the decontamination of equipment and personnel.

**Deactivation:** Deactivation is the process of placing a building, portion of a building, or building component (as used in the rest of this paragraph "building") in a safe and stable condition to minimize the long-term cost of a surveillance and maintenance program in a manner that is protective of workers, the public, and the environment. Actions during deactivation could include the removal of fuel, draining and/or deenergizing of nonessential systems, removal of stored radioactive and hazardous materials, and related actions. As the bridge between operations and decommissioning, based upon Decommissioning Operations Plans or the Decommissioning Program Plan, deactivation can accomplish operations-like activities such as

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final process runs, and decontamination activities aimed at placing the facility in a safe and stable condition. Deactivation does not include decontamination necessary for the dismantlement and demolition phase of decommissioning (i.e., removal of contamination remaining in fixed structures and equipment after deactivation). Deactivation does not include removal of contaminated systems or equipment except for the purpose of accountability of special nuclear material (SNM) and nuclear safety. It also does not include removal of contamination except as incidental to other deactivation or for the purposes of accountability of SNM and nuclear safety. (RFCA ¶25 [y])

**Debris:** All nonsoil material found during ER remediation is referred to as debris.

**Decommissioning:** Decommissioning means, for those buildings, portions of buildings, or building components (as used in the rest of this paragraph "building") in which deactivation occurs, all activities that occur after the deactivation. It includes surveillance, maintenance, component removal, decontamination and/or dismantlement, and size reduction for the purpose of retiring the building from service with adequate regard for the health and safety of workers and the public and protection of the environment. For those buildings in which no deactivation occurs, the term includes characterization, surveillance, maintenance, component removal, decontamination and/or dismantlement, and size reduction for the purpose of retiring the building from service with adequate regard for the health and safety of workers and the public and protection of the environment. (RFCA ¶25[z])

**Decontamination:** Decontamination is the removal or reduction of radioactive or hazardous contamination from facilities, equipment, or soil by manual, mechanical, chemical, or other means.

**Dense Nonaqueous Phase Liquid (DNAPL):** A DNAPL is an organic liquid, composed of one or more contaminants that is heavier than water and does not mix with water (e.g., chlorinated solvents).

**Derived Air Concentration (DAC):** The DAC is used to (1) estimate the potential dose from inhalation of workers exposed to airborne radioactive material, (2) determine the appropriate level of PPE required in an area, (3) evaluate the efficacy of engineering controls, and (4) evaluate the need to perform a dose assessment.

The DAC is the concentration of a given radionuclide in air which, if breathed by reference man for 2,000 hours (assumed to be 1 working year), under conditions of light work (assumed air inhalation rate of 1.2 m<sup>3</sup>/h), results in an intake of 1 annual limit of intake.

**Dismantlement:** Dismantlement is the demolition and removal of any building or structure or a part thereof during decommissioning. (RFCA ¶25[ab])

**Facilities:** Facilities include buildings and other structures, their functional systems and equipment, and other fixed systems and equipment installed therein, outside plant, including site development features such as landscaping, roads, walks, and parking areas, outside lighting and

communication systems, central utility plants, utilities supply and distribution systems, and other physical plant features

**Geographic Information System (GIS):** A GIS is a computer-based system that manages spatial data sets. A GIS can be defined as an organized collection of computer hardware, software, geographic data, and personnel designed to efficiently capture, store, update, manipulate, analyze, and display all forms of geographically referenced data. In other words, it is a computer system capable of holding and using data describing places on the earth's surface.

**Geostatistical Spatial Correlation:** The relationship between spatial measurements is referred to as the geostatistical spatial correlation. The concept of spatial correlation is that nearby sampling points are alike. Spatial correlation can be characterized through use of the semi-variogram model, which provides a measure of variance as a function of distance between data points. This measure is defined as one-half of the average squared difference between two values separated by vector  $h$ .

**Global Positioning System (GPS):** The GPS is a constellation of 24 satellites used for navigation and precise geodetic position measurements. The U.S. Department of Defense operates GPS satellites. GPS provides specially coded satellite signals that can be processed in a GPS receiver, enabling the receiver to compute position, velocity, and time. Four GPS satellite signals are used to compute positions in three dimensions and the time offset in the receiver clock.

**Hazard:** A hazard is a source of danger (i.e., material, energy source, or operation) with the potential to cause illness, injury, or death to personnel, or damage to a facility or the environment without regard for the likelihood or credibility of accident scenarios or consequence mitigation.

**Hazardous Waste:** Hazardous waste is any solid waste that either exhibits a hazardous characteristic (i.e., ignitability, corrosivity, reactivity, or toxicity) or is named on one of three lists published by EPA in 40 CFR 261, *Identification and Listing of Hazardous Waste*. To be considered hazardous, a waste must first meet EPA's definition of "solid waste," which includes liquids.

**Histogram:** A histogram is a multiple-bar diagram showing relative abundance of material or quantitative determinations (contaminant concentration) divided into a number of regulatory arranged groups.

**Interim Measure (IM):** IM is the RCRA/CHWA term for a short-term action to respond to imminent threats, or other actions to abate or mitigate actual or potential releases of hazardous wastes or constituents.

**Interim Remedial Action (IRA):** IRA is the CERCLA term for an expedited response action performed in accordance with remedial action authorities to abate or mitigate an actual or potential threat to public health, welfare, or the environment from the release or threat of a hazardous substance from RFETS.

**Inverse Distance Weighting (IDW):** Inverse distance is a simple interpolant. The basic premise of inverse distance is that data points are weighted by the inverse of their distance to the estimation point. This approach has the effect of giving more influence to nearby data points than those farther away. Additionally, the inverted distance weight can be raised to further reduce the effect of data points located farther away.

**Isopleth:** A line on a map or chart drawn through points of equal size or abundance is referred to as an isopleth.

**Job Hazard Analysis (JHA):** A JHA is an analysis of procedurally controlled activities that uses developed procedures as a guide to address and consider the hazards due to any exposures present during implementation of (job) procedures, the use and possible misuse of tools, and other support equipment required by the procedures. It is a type of hazard analysis process that breaks down a job or task into steps, examines each step to determine what hazard(s) exist or might occur, and establishes actions to eliminate or control the hazard.

**Kriging:** The spatial correlation model derived from the variogram analysis is used in a kriging simulation. Kriging is the process of simulating predicted values in unsampled areas by calculating a weighted least-squares mean of the surrounding data points. The weighted values account for not only the distance between known observations and points of predicted values, but also the correlation of clustered observations. For example, clustered data may provide redundancy and are weighted less than a single observation at an equal distance in a different direction. The kriging simulations are processed to produce maps defining the spatial distribution of the contaminants and uncertainty in the spatial distribution.

Probability kriging is based on multiple simulations of the contaminant concentration. The outcome of each simulation reflects the actual observations within the area. The multiple simulations of the concentrations provide the basis for determining the relative uncertainty so the probability of exceeding a specified threshold value (e.g., RFCA AL) at any point within the area can be estimated. The simulations are processed to produce maps defining the spatial distribution of the contaminants and the inherent uncertainty in spatial distribution.

**Lead Regulatory Agency (LRA):** The LRA is the regulatory agency (EPA or CDPHE) that is assigned approval responsibility with respect to actions under RFCA and at a particular OU pursuant to Part 8 of RFCA. In addition to its approval role, the LRA will function as the primary communication and correspondence point of contact. The LRA will coordinate technical reviews with the Support Regulatory Agency and consolidate comments, ensuring technical and regulatory consistency and that all regulatory requirements are addressed (RFCA §25[aq]).

**Light Nonaqueous Phase Liquid (LNAPL):** LNAPLs are liquids that do not mix with water and are lighter than water (e.g., gasoline and fuel oil).

**Low-Level (LL) Waste:** LL waste is any radioactive waste that is not classified as TRU waste, high-level waste, or spent nuclear fuel. No minimum level of radioactivity has been specified for LL waste. LL waste mixed with hazardous waste is referred to as LLM waste.

**Metadata:** Metadata is information that describes other primary data used within the decision management system (e.g., a description field within an ACCESS database)

**No Action/No Further Action (NA/NFA):** An NFA is the determination that remedial actions (or further remedial actions) are not currently warranted; however, NA/NFA decisions are subject to revisitation at the time of the CAD/ROD in accordance with Attachment 6, and are also subject to paragraph 238 (Reservation of Rights) and to the CERCLA § 121(c) mandate for five-year review of remedial actions that result in hazardous substances, pollutants or contaminants remaining at the Site (RFCA Part 5 [av])

**Nonroutine Actions:** Nonroutine actions, for the purpose of this RSOP, are those remedial actions that are a different remedy than excavation

**Operable Unit (OU):** OU refers to a grouping of IHSSs into a single management unit

**PCB Bulk Product Waste:** Waste derived from manufactured products containing PCBs in a nonliquid state, at any concentration where the concentration at the time of designation for disposal was equal to or greater than 50 ppm PCBs is referred to as PCB bulk product waste. PCB bulk product waste excludes PCBs or PCB items, but includes (1) nonliquid bulk waste or debris from the demolition of buildings and other man-made structures, (2) PCB-containing waste from the shredding of automobiles, household appliances, or industrial appliances, (3) plastics, preformed or molded rubber parts and components, applied dried paints, varnishes, waxes, or other similar coatings or sealants, caulking, adhesives, paper, Galbestos, sound-deadening or other types of insulation, and felt or fabric products such as gaskets, and (4) fluorescent light ballasts containing PCBs in the potting material

**PCB Item:** A PCB item is any PCB article, article container, PCB container, or PCB equipment that deliberately or unintentionally contains, or has as a part of, any PCB or PCBs. This category includes electrical equipment such as transformers, capacitors, and switches

**PCB Remediation Waste:** PCB remediation waste is waste containing PCBs as a result of a spill, release, or other unauthorized disposal, at the following concentrations: (1) materials disposed prior to April 18, 1978, that are currently at concentrations greater than or equal to 50 ppm PCBs, regardless of the concentration of the original spill, (2) materials that are currently at any volume or concentration where the original source was greater than or equal to 500 ppm PCB beginning on April 18, 1978, or greater than or equal to 50 ppm beginning on July 2, 1979, and (3) materials that are currently at any concentration if the PCBs are from a source not authorized for use under 40 CFR Part 761

PCB remediation waste includes soil, rags, and other debris generated as a result of any PCB spill cleanup, including, but not limited to, the following: (1) environmental media containing PCBs, such as soil and gravel, dredged materials, such as sediments, settled sediment fines, and decanted aqueous liquid from sediment, (2) sewage sludge containing less than 50 ppm PCBs and not in use in accordance with §760.20(a) (relating to uses of sewage sludge regulated under Parts 257, 258, and 503 of 40 CFR), (3) PCB sewage sludge, commercial or industrial sludge

contaminated as a result of a spill of PCBs, including sludge located in or removed from any pollution control device, and decanted aqueous liquid from an industrial sludge, and (4) buildings and other man-made structures, such as concrete or wood floors or walls contaminated from a leaking PCB or PCB-contaminated transformer, porous surfaces, and nonporous surfaces

**Performance Monitoring:** Performance monitoring is air, surface water, or groundwater monitoring performed around decommissioning and remediation projects

**Process Waste:** Process waste is solid, hazardous, and mixed waste generated as a result of normal building operations and deactivation activities. Process waste includes mixed residues, liquids, sludges, and oils in tanks and ancillary equipment, containerized waste generated prior to approval of this RSOP, and liquid waste chemicals (regardless of when generated)

**Process Waste Line:** Process waste lines are pipelines that carry process waste from the process system to the waste treatment system. At RFETS, the NPWL system is currently in operation. The OPWL was replaced by the NPWL.

**Radiological Buffer Zone (RBZ):** The RBZ is an intermediate area established to prevent the spread of radioactive contamination and protect personnel from radiation exposure. The area surrounds or is contiguous with Contamination Areas, High Contamination Areas, Airborne Radioactivity Areas, Radiation Areas, or High Radiation Areas.

**Radiological Contamination:** Radioactive material present in a location where it should not be present is referred to as radiological contamination.

**RCRA-Regulated Units:** RCRA-regulated units are treatment, storage, or disposal areas that are regulated under RCRA.

**RCRA Stable:** RCRA stable is a step toward RCRA closure, whereby wastes are removed from a RCRA-regulated unit thereby eliminating the possibility of future waste input. For tank systems, this means a tank and its ancillary equipment have been drained to the maximum extent possible using readily available means, with the objective of achieving less than 1 percent holdup, and with no significant sludge or significant risk remaining. Physical means must then be used to ensure no waste is reintroduced to the system (e.g., lock out/tag out or blank flanges).

**Release Site:** A release site is a site where a hazardous or radioactive waste, hazardous constituent, or radionuclide was released to the environment.

**Remedial Action Objectives (RAOs):** RAOs are contaminant- and medium-specific goals designed to protect human health and the environment and are used to guide the accelerated actions.

**Remediation Waste:** Remediation waste includes all solid, hazardous, and mixed waste, all media and debris containing hazardous substances or listed hazardous or mixed wastes, or exhibiting a hazardous characteristic, and all hazardous substances generated from activities.

regulated under RFCA as RCRA corrective actions or CERCLA response actions, including decommissioning under an approved decision document. Remediation waste includes waste generated from decommissioning activities performed under this RSOP, solid waste chemicals (regardless of when generated), and residual liquids or sludges remaining in "RCRA stable" or "physically empty" tanks. Remediation waste does not include waste generated from other activities (e.g., normal building operations and deactivation activities).

**Resource Conservation and Recovery Act (RCRA):** RCRA, 42 U.S.C. §6901 *et seq.*, enacted in 1976, as amended by the Hazardous and Solid Waste Amendments of 1984, the Federal Facility Compliance Act of 1992 (RFCA §25[a]), and implementing regulations ensures solid and hazardous waste are managed in a manner that is protective of human health and the environment by focusing on improving waste disposal methods with the goal of preventing future CERCLA releases.

**RFCA Standard Operating Protocol (RSOP):** An RSOP is an approved protocol applicable to a set of routine environmental remediation and/or decommissioning activities regulated under RFCA that DOE may repeat without reobtaining approval after the initial approval because of the substantially similar nature of the work to be completed. Initial approval of an RSOP will be accomplished through an IM/IRA process.

**Routine Actions:** For the purpose of this RSOP, routine actions are those remediations that include excavation of contaminated soil and debris. Work controls may be used to control hazards at these remediations.

**Sanitary Waste:**

**Routine Sanitary Waste:** This type of sanitary waste is collected in dumpsters located throughout RFETS. Typically these wastes consist of soft or compactable items generated by office/administrative and cafeteria areas and do not require a radiological WRE prior to generation or disposal into dumpsters. Typical routine sanitary waste includes packaging and general office refuse, food waste from cafeteria or offices, nonrecyclable paper, cardboard, and miscellaneous glass, metal, rubber, and plastic items from routine office/administrative operations.

**Special Sanitary Waste:** Special sanitary waste is sanitary waste that requires specific treatment, analysis, certification, and/or packaging prior to disposal offsite. Special sanitary waste includes asbestos and beryllium waste that is not hazardous waste.

**Spatial Variability:** Spatial variability is the measure of the differences between sampling points. It is defined by the semivariogram model.

**Substantive Requirements:** Substantive requirements are those requirements that pertain directly to actions or conditions in the environment. Examples include quantitative health- or risk-based restrictions upon exposure (for particular contaminants), technology-based requirements for actions taken upon hazardous substances (e.g., incinerator standards requiring

particular destruction and removal efficiency), and restrictions upon activities in certain special locations (e.g., standards prohibiting certain types of facilities in a floodplain)

**Triangulation:** The laying out and accurate measurement of a network of triangles is referred to as triangulation

**Upper Confidence Limit (UCL):** The UCL is a random interval based on the upper bound of random variables that are computed from sample statistics. That is, prior to collecting a single sample, the UCL is the probability that the confidence interval will contain that particular sample measurement

**Variogram:** A variogram is a fundamental geostatistical tool used to define the spatial correlation structure of spatial data sets. It is used to compare paired sample data at different locations at given separation distances. The semi-variogram model is used to define the nugget, sill, and range, which are imperative kriging parameters

Response to CDPHE Comments, October 23, 2001 – Draft RSOP for Routine Soil Remediation

	<b>CDPHE Comments, October 23, 2001</b> <u>General Comments</u>	<b>Response</b>
<b>1</b>	The distinction between "routine" soil remediation and non-routine remediation is not sufficiently clear Amend the ERRSOP to exclude the Old Process Waste Lines from the scope of this document	<p>Based on discussions and agreements reached at the November 1 2001, meeting of DOE, CDPHE, EPA, and K-H, the ER RSOP was clarified</p> <p>Additional text was added to clarify that excavation of OPWL in IHSSs, PACs, and UBC Sites and OPWL outside of IHSSs, PACs, and UBC Sites is covered under the ER RSOP This remediation includes sealing of pipe ends OPWL remediation that does not include excavation, (i e , not the RSOP remedy) will be covered under a separate decision document</p> <p>Additional text and a new diagram have been added to Section 5 0 to clarify "routine "</p>
<b>2</b>	DOE's notice that it intends to invoke the ERRSOP is subject to regulatory approval rather than concurrence The LRA should review the proposed work to determine whether it really falls within the scope of the ERRSOP LRA approval of the proposed cleanup work follows review of the sampling results	<p>Based on discussions and agreements reached at the November 1, 2001, meeting of DOE, CDPHE, EPA, and K-H on the ER RSOP Notification, CDPHE and EPA will have 14 calendar days to review the Notification The regulatory agencies can approve all or part of the Notification This will allow work to continue if specific issues require resolution</p> <p>This text, along with a list of what will be included in the ER RSOP Notification, was added to Section 1 4</p> <p>Based on additional discussions and agreements with the regulatory agencies the following text was also added "The LRA will approve or disapprove the Notification for each IHSS or IHSS Group addressed in the Notification within 14 calendar</p>



	<p>days after submittal Any disapproval shall state, with specificity, the changes required to obtain LRA approval, and DOE may resubmit the Notification for 14 calendar day review and approval after making the changes DOE may also invoke the dispute resolution process in accordance with RFCA, Part 15, Resolution of Disputes, Subpart B, for a disapproval or when the LRA fails to respond within 14 calendar days ”</p> <p>The ER RSOP Notification will include the following</p> <ul style="list-style-type: none"> <li>• Map of IHSS/PAC/UBC site that may require remediation,</li> <li>• List of COCs,</li> <li>• Basic project assumptions,</li> <li>• Stewardship analysis,</li> <li>• Accelerated action remediation goals,</li> <li>• Treatment (if necessary),</li> <li>• Project-specific monitoring (if any),</li> <li>• RCRA Units and intended waste disposition, and</li> <li>• Projected schedule</li> </ul> <p>The Notification consultative process will include the following activities</p> <ul style="list-style-type: none"> <li>• RFETS staff and the LRA will consult on what the Notification will include,</li> <li>• RFETS staff will prepare the Notification for regulatory agency review, and</li> <li>• RFETS staff and the regulatory agencies will attend a briefing to discuss and come to agreement on the Notification at the briefing</li> </ul>
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	<b><u>Specific Comments</u></b>	
<b>1</b>	<p>Page 2, Section 1 0, Fourth Paragraph</p> <p>Specific stewardship needs are defined at remedy selection These requirements are to be added at remedy selection to the IMP and Stewardship Plan, and implemented at that time</p> <p>Section 1 0, page 2 last paragraph Add after third sentence, "Closure planning does not include funding for additional remediation once</p>	<p>As indicated above, a stewardship evaluation will be included in the ER RSOP Notification Further, as agreed upon at the November 1, 2001, meeting between DOE, CDPHE, EPA, and K-H, stewardship implications will be identified when the remediation under this RSOP is completed Near-term stewardship requirements and long-term stewardship recommendations will be included in the Closeout Report DOE has agreed that the long-term stewardship recommendations will be summarized annually for all completed accelerated actions Near-term requirements (fencing, signage, etc) will be implemented immediately after remediation Other physical controls that require engineering documentation will be designed and implemented as soon as practical after remediation Monitoring requirements will be implemented by the IMP group through the IMP, as appropriate Near-term actions may be superseded by long-term stewardship actions</p> <p>Annual stewardship summaries will be included in the RI/FS and Stewardship Plan The stewardship considerations and needs will be the basis for development of alternatives for the feasibility study</p> <p>The discussion of whether costs for additional remediation after accelerated actions are completed are available is outside the scope of the ER RSOP because the RSOP is a protocol, not a budget or policy document</p>

	<p>accelerated actions are completed ”</p> <p>Section 1 0, page 2 last paragraph</p> <p>Add to end of 5<sup>th</sup> sentence, “ and access restrictions ”</p>	<p>“and access restrictions” was added to the end of the fifth (now fourth) sentence of the last paragraph in Section 1 0</p>
2	<p>Page 3, Section 1 2, Second Paragraph</p> <p>At the time of remedy selection, the effectiveness of the remedy must be demonstrated For remedies that leave contamination above unrestricted levels, the effectiveness of long-term controls must be shown Since the long-term measures shown elsewhere in the document are not proven for federal properties, additional demonstration will be required prior to remedy acceptance</p>	<p>The ER RSOP covers accelerated removal actions Long-term controls will be described in the RFETS Stewardship Plan See response to Specific Comment No 1 above</p>
3	<p>Page 3, Section 1 2, Third Paragraph</p> <p>Equating the subsurface soil cleanup levels to “the agreed-upon cleanup levels” is nebulous and leaves a major decision unaddressed for many of the remedial actions covered by this RSOP In addition, RFCA requires remedies to be protective of surface water How do these cleanup levels protect surface water? The last sentence should be changed to reflect that implementation of these remedies is expected to satisfy final requirements</p>	<p>We agree that this phrase is not precise however, it is used to cover potential changes to the RFCA Tier structure and other changes to ALs This terminology is the one selected by the DOE Complex Stewardship Working Group in its report to the U S Congress</p> <p>The subsurface ALs were designed to be protective of surface water Reference RFCA Attachment 5, Section 4 2 for an explanation of how the subsurface ALs were calculated</p> <p>Protection of surface water is an RAO The surface water evaluation is included in the stewardship evaluation The</p>

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		<p>Notification will include the interim remediation goals, which incorporate the ALs, stewardship, and ALARA</p> <p>The last sentence has been changed to the following “Although cleanup levels required to implement the final remedy will be determined in the CAD/ROD, it is anticipated that the accelerated action cleanup will be demonstrated to be protective in the CRA ”</p>
4	<p>Page 4, Section 1 4</p> <p>The Notification could be handled in a manner similar to the regulatory agency approval of IA SAP or BZ SAP addenda</p> <p>DOE will notify the Lead Regulatory Agency (LRA) prior to implementing this RSOP for each specific project A Notification will be prepared at the beginning of the fiscal year and as the need to remediate arises A map of potential remediation targets and contaminants of concern (COCs), as well as a list of documents making up the AR file for the individual project will be included in the Notification CDPHE and EPA will have 14 calendar days for review and approval of the Notification The regulatory agencies can approve all or part of the Notification This will allow work to continue if specific issues require resolution No response from the regulatory agencies during the 14-day period implies approval The Notification will become part of the AR and will be placed in Appendix B of this</p>	<p>Based on discussions and agreements reached at the November 1, 2001, meeting of DOE, CDPHE, EPA, and K-H on the ER RSOP Notification, CDPHE and EPA will have 14 calendar days to review the Notification The regulatory agencies can approve all or part of the Notification This will allow work to continue if specific issues require resolution No response from the regulatory agencies during the 14-day period implies approval</p> <p>This text, along with a list of what will be included in the ER RSOP Notification, was added to Section 1 4</p> <p>Based on additional discussions and agreements with the regulatory agencies the following text was also added “The LRA will approve or disapprove the Notification for each IHSS or IHSS Group addressed in the Notification within 14 calendar days after submittal Any disapproval shall state, with specificity, the changes required to obtain LRA approval, and DOE may resubmit the Notification for 14 calendar day review and approval after making the changes DOE may also invoke the dispute resolution process in accordance with RFCA, Part 15, Resolution of Disputes, Subpart B, for a disapproval or when the LRA fails</p>

	<p>Document</p> <p>This process is contingent upon prior consultation in developing the proposed specific projects After Notification, the Lead Regulatory Agency may issue a Stop Work Order for any or all of the proposed remedial actions if they are concerned about the appropriate execution of the project</p> <p>If the activities included in the notification include RCRA closure activities, then we have 30 days to approve the notification This is consistent with the Component RSOP Notification requirements and the approved Closure Plans (See Section 8 3 of the Component RSOP )</p>	<p>to respond within 14 calendar days ”</p> <p>Stop work authority and when it can be implemented is clearly defined in RFCA, Part 14</p> <p>For IHSS Groups with RCRA Units, the 30-day RCRA review period will begin when DOE informs the LRA through the consultative process that a RCRA Unit will be closed This text was added to Section 1 4</p>
5	<p>Page 7, Section 2 1, Last Paragraph</p> <p>Replace the third sentence of the last paragraph with "The</p>	

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	<p>Notification is subject to LRA approval ", delete the remainder of this paragraph, and make appropriate change to Table 1</p> <p>Section 2 2 2</p> <p>Add to end of first paragraph "Failure to reach concurrence on completion of remediation will result in failure to approve the completion report and, possibly, issuance of a stop work order"</p>	<p>The paragraph was revised as follows</p> <p>"The first agency checkpoint in the ER RSOP process is approval of the decision document itself The intent to invoke the RSOP is provided through a Notification issued by DOE to the regulatory agencies The regulatory agencies have 14 days to review and approve the Notification at this second checkpoint The third checkpoint is when the regulatory agencies concur that excavation is complete, prior to backfilling The final regulatory agency checkpoint is approval of the Closeout Report "</p> <p>Table 1 was revised accordingly</p> <p>The following sentence was added to the end of the first paragraph "Failure to reach concurrence on the completion of remediation will result in failure to approve the Closeout Report and, possibly, issuance of a stop work order "</p> <p>Additionally, the last paragraph in Section 2 2 2 was deleted</p>
6	<p>Page 7, Section 2 1, Last Paragraph</p> <p>How will the data used in RADMS to make the remedy decision be preserved to document the decision?</p>	<p>Electronic data will be archived in RADMS, SWD, and the AR Additionally, the data will be available, in hard copy, in the Closeout Report The Closeout Reports will be archived in the AR and summarized in the RI/FS</p>

7	<p>Page 8, Table 1</p> <p>Under the “Agency Checkpoint” column</p> <ul style="list-style-type: none"> <li>- For “Prepare RSOP Notification”, “Concurrence on Notification” implies that non-concurrence is a possible response, but this possibility is not described or accounted for</li> <li>- For “Prepare RSOP Notification”, “Approval of sampling Addendum” is already listed for “Prepare SAP Addenda” and does not apply here</li> </ul>	<p>It is anticipated that by working closely with the regulatory agencies, concurrence will be achieved Table 1 was changed to reflect the discussions and agreements reached at the November 1, 2001, meeting of DOE, CDPHE, EPA, and K-H</p> <p>The bullet was deleted</p>
8	<p>Page 10, Section 2 2 3</p> <p>Revise to clarify that the closeout reports are prepared on an IHSS by IHSS basis (or, in some cases, for a group of IHSS's)</p> <p>Section 2 2 3, First Paragraph, Second Sentence</p> <p>Add before “stewardship recommendations”, “near-term requirements and long-term ”</p>	<p>The text was revised to indicate that the Closeout Reports will be prepared on an IHSS or IHSS Group basis</p> <p>The phrase “near-term stewardship requirements and long-term” was added before “stewardship recommendations ”</p>
9	<p>Page 26, Section 4 1, Last Bullet</p> <p>The decision to leave slabs in place must include LRA consultation.</p>	<p>This reference to leaving slabs in place is not a decision regarding final disposition of the slab, but rather an issue of timing and responsibility for slab removal Slabs may be left in place, temporarily, for health and safety reasons As with all work performed under this RSOP, the LRA will be consulted</p> <p>Clarification was provided in the RSOP</p>

10	<p>Page 28, Section 4 1 Last Bullet</p> <p>Update to reflect more recent decisions regarding B374 Treatment</p>	The bullet was updated
11	<p>Page 29, Section 4 2 2</p> <p>Project-specific monitoring is generically described here by simply referring to the IMP. The actual monitoring, however, may need to vary considerably from project to project. A monitoring plan should be described for each remedial project covered by this RSOP, similar to monitoring plans included in past remediation decision documents, subject to LRA approval. These project-specific monitoring plans could be included in the Notification materials, closeout reports, Stewardship Plan and IMP. Once the remedy is implemented, required monitoring should be initiated.</p> <p>It is unclear how potential impacts to groundwater contamination are addressed in this remedy selection process.</p>	<p>As agreed upon at the November 1, 2001, meeting between DOE, CDPHE, EPA, and K-H project-specific monitoring information will be included in the Notification. Long-term monitoring needs and stewardship considerations will be integrated with the IMP and the Stewardship Plan as noted in the response to Specific Comment No. 1.</p> <p>The remedy in the ER RSOP is soil and debris excavation. Potential impacts to groundwater from contaminated soil are not evaluated. Potential impacts to groundwater are addressed in the stewardship evaluation to determine if additional stewardship actions are warranted.</p>
12	<p>Page 30, Section 4 3</p> <p>Waste will likely be generated faster than it can be dispositioned during some periods of the ER schedule. This section does not describe the interim management and storage of what could be large volumes of</p>	Text was added to Section 10 0, Waste Management, that indicates that management of soil and debris will be generally consistent with the protocols agreed to in the Asphalt and Soil Management RSOP.



	remediation waste    Waste management of ER soils and debris should be generally consistent with the protocols agreed to in the Asphalt & Soil Management RSOP Staging piles are listed as ARARs in Table 3	
13	<p>Page 30, Section 4 4</p> <p>It is unclear what process is used to make the Site Services decisions and how these will be integrated with D&amp;D and ER decisions</p> <p>How and in what venue will decisions be made regarding remediation or plugging of utility trenches that might convey contaminated exfiltration or groundwater?</p> <p>Section 4 4, first paragraph, add following second sentence "Site Services staff will consult with the LRA, as appropriate, prior to modification or closure of site systems"</p>	<p>Site Services decisions are integrated with ER decisions as described in Section 4 0    Decisions regarding contaminated soil will be made between the ER staff and regulatory agencies through the consultative process</p> <p>If during contaminated soil and debris remediation under this RSOP, it is determined that a preferential pathway is present the consultative process will be used to determine whether it is appropriate to disrupt the pathway</p> <p>The following sentence was added to Section 4 0 after the first sentence "These activities are not remediation activities under this RSOP but are interface points    Some activities could be covered under other decision documents "</p>
14	<p>Page 32, Section 5 1 1</p> <p>The first three surface soil RAOs could be combined into one since the criteria of all three (cancer risk, hazard index, and radiation dose) are incorporated into the action levels</p> <p>Prevent human exposure (direct contact, ingestion, inhalation, and external irradiation) to contaminated</p>	<p>The RSOP language was modified</p>

	<p>surface soils that exceed RFCA action levels</p> <p>Cleanup to current RFCA action levels, which are based on restricted uses, will not allow for the minimization of institutional controls, one of the long-term RAOs listed in Section 5.1. These RAOs are insufficient for surface soils, since they do not achieve long-term RAOs</p>	<p>This RSOP is AL neutral. Work under this RSOP will be performed in accordance with ALs developed by the RFCA parties that have been determined to be protective of human health and the environment for the appropriate land use in combination with appropriate controls. The RSOP includes appropriate stewardship and ALARA evaluations to determine whether additional cleanup beyond ALs is appropriate. Stewardship implications of residual contaminants will be documented in the Closeout Report and summarized as noted in response to Specific Comment No. 1.</p>
15	<p>Page 34, Section 5.1.1, Second Paragraph</p> <p>Specific long-term needs are defined at remedy selection. These requirements are to be added at remedy selection to the IMP and Stewardship Plan, and implemented at that time. Surface water protection is an RAO for this action.</p>	<p>Long-term stewardship implications will be defined when the accelerated action is complete. This information will be collected as noted in the response to Specific Comment No. 1.</p> <p>RAO 4 in this section states "Protect surface water quality."</p>
16	<p>Page 34, Section 5.1.2</p> <p>RAO #2 should be modified to include bedrock surfaces that may be contaminated.</p>	<p>This RSOP includes remediation to the top of bedrock or top of the water table, whichever is shallower. However, there may be building structures that extend beneath bedrock or the water table (e.g., sumps) that require remediation. In these instances, the structure will be removed in accordance with Sections 6.5, 6.6, and 6.7.</p> <p>The ROA was changed to the following: "Remediate soil containing COCs above agreed-upon cleanup levels, from 6</p>

		<p>inches bgs generally to the top of the saturated zone or top of bedrock, as appropriate ”</p> <p>The following text was added to Section 6 6 “Other structures associated with slabs and foundations (e g , sumps, source pits) that were not removed by decommissioning may be removed during remediation under this RSOP if the remediation is excavation This may include structures below the water table or the top of bedrock ”</p> <p>As stated in the ER RSOP the consultative process will be used to determine the COCs and remediation area, and when remediation is complete</p>
17	<p>Page 34, Section 5 1 2</p> <p>RAO #3 should either be eliminated since it is redundant with long-term RAO #2 in Section 5 1, or it should be expanded to read like that RAO and also included in Section 5 1 1</p> <p>Specific long-term needs are defined at remedy selection These requirements are to be added at remedy selection to the IMP and Stewardship Plan, and implemented at that time</p>	<p>RAO 3 was eliminated</p> <p>Long term stewardship implications will be defined when the accelerated action is complete This information will be collected as noted in response to Specific Comment No 1</p>
18	<p>Page 37, Table 3</p> <p>Add Colorado Hazardous Waste Control Act under Solid Waste Disposal Act</p> <p>Suggest adding the following sentence in Section 5 1 3</p>	<p>The following text was added Colorado Hazardous Waste Act</p> <p>The following text was added before Table 3</p>

<p>before the table "To the extent actions under this ERRSOP occurring in the Industrial Area involve hazardous wastes or hazardous constituents (including soil or other media that contains hazardous wastes or constituents, or debris contaminated with hazardous wastes or constituents), such actions are regulated directly under CHWA, rather than as ARARs under CERCLA See RFCA paragraph 68 In such cases, the CHWA regulations listed in Table 3 apply directly to the actions taken under this ERRSOP "</p> <p>In the listing for subpart D, there is a typo - it should read 56(a-1), not 56(a-I)</p> <p>Shouldn't subpart I (Use and management of containers) list section 264 175 (Containment)?"</p> <p>For temporary units, please add 264 553(d)</p> <p>ARARs under staging pile regs should include 264 554(d)(1)(i)-(iii), (e)(1) and (2), (f)(1)-(3), (h), (j)(1) &amp; (2), and (k)(1)</p> <p>The ERRSOP needs to include a process for CDPHE to approve the design for the staging piles and thermal treatment units</p>	<p>"RFCA is a CHWA corrective action order and a CERCLA Section 120 interagency agreement Under RFCA paragraph 25d, the approved ER RSOP becomes part of RFCA and therefore part of the CHWA corrective action order This ER RSOP does not change any provision of the body of RFCA Actions under this ER RSOP occurring in the IA in response to releases of hazardous wastes or hazardous constituents (including soil or other media that contains hazardous wastes or constituents, or debris contaminated with hazardous wastes or constituents), and to close interim status or permitted units are regulated under CHWA authority as provided in RFCA, rather than under CERCLA authority This ER RSOP, and CDPHE decisions pursuant to it, provide the administrative means for implementing CHWA authority Pursuant to RFCA paragraph 97 and Section X of the RFETS CHWA permit, the ER RSOP also functions as a modification to the Site's closure plan for regulated units addressed in the ER RSOP And pursuant to Section 6 5 3 of this ER RSOP, the ER RSOP Notification functions as the closure description document for units closed under this ER RSOP Refer to RFCA Parts 8 and 9, and in particular paragraphs 13d, 68, and 96 - 105</p> <p>To the extent the foregoing actions under this ER RSOP occurring in the IA address hazardous wastes or hazardous constituents, relevant CHWA regulations apply to those actions taken under this ER RSOP, and are not CERCLA ARARs Other actions under this ER RSOP, i e , those that address radionuclides or other hazardous substances that are not hazardous wastes or constituents, as well as all actions that occur in the BZ (because such actions would be regulated under CERCLA authority) must</p>
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	<p>attain, to the maximum extent practicable, federal and state ARARs listed in Table 3</p> <p>Wastes generated by activities under this ER RSOP are remediation wastes as defined in RFCA paragraph 25 bf ”</p> <p>The following changes were made in Table 3</p> <p>56(a-I) was changed to 56(a-i)</p> <p>554(d)(1)(I) and (ii) was changed to 264 553(a-e)</p> <p>554 (d)(I)-(iv) was changed to 264 554(a- k)</p>
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<p>19</p>	<p>Page 46, Section 5 2, Second Paragraph</p> <p>Replace with the following</p> <p>Stewardship controls are required for any area where contamination remains above unrestricted use levels. These controls include both general controls and site-specific controls. General controls include site fencing and land use designation, but are insufficient for controlling specific types of access to specific sites. The type of access to be restricted and, hence, the type of control required, is determined by the degree, amount and type of contamination left behind. For example, in an area with contaminated groundwater, restrictions on well drilling or use of groundwater may be needed, but near surface soil disturbance may be allowed.</p> <p>Section 5 2, Second Bullet</p> <p>Insert “and ecological resources” at the end of the first sentence</p> <p>Section 5 2, Third bullet is misstated. Delete the phrase, “ at three times the RFCA Tier I AL for surface soil or agreed-upon cleanup levels for subsurface soil ”. The “three times the RFCA Tier I AL” is an upper limit on the elevated measurement comparison calculation.</p>	<p>Based on discussions and agreements reached at the November 1, 2001, meeting of DOE, CDPHE, EPA, and K-H, the following text was added to Section 5 2 (now 5 4 1), third paragraph, “Based on the amount and configuration of residual contamination, near-term requirements will be implemented and long-term recommendations for institutional or physical controls will be documented in the Closeout Report. Stewardship recommendations will be summarized yearly for use in the RI/FS and Stewardship Plan.”</p> <p>The phrase “and ecological resources” was added to Section 5 2, at the end of the second bullet.</p> <p>The third bullet was rewritten as follows: “When analytical results indicate a hot spot is present according to the elevated measurement comparison in the IASAP (DOE 2001b) and BZSAP (DOE 2001c).”</p>
<p>20</p>	<p>Page 47, Figure 7</p> <p>The set of data points described by the fourth decision</p>	<p>The fourth decision diamond is not redundant because the</p>

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	<p>diamond exactly describes the inverse of the decision diamond above it and is therefore redundant The set of data points in the fourth decision diamond is covered by the sixth decision diamond</p> <p>Figure 7</p> <p>Replace "Take Action" with "Remediate AOC" in the box to the right of the 5th decision diamond The last decision diamond could be eliminated since the 6th diamond covers all the possible situations requiring any action If the answer is "No" to the 6th decision diamond, then NFA can be proposed This would also agree with the bullets in the text in Sec 5 2</p>	<p>outcome of each decision is different This fourth decision diamond describes the initial decision to proceed toward remediation and is based on a straight AL comparison The sixth decision diamond describes the remediation decision after data aggregation</p> <p>"Take Action" was replaced with "Remediate AOC "</p> <p>The last decision diamond was removed</p>
21	<p>Page 49, Section 5 2 1, First Paragraph</p> <p>Modify to read</p> <p>Although the ER RSOP addresses accelerated actions, these actions will become the final action if properly implemented Remediation under this RSOP will achieve risk reduction through source removal, however, the decision to remove some source material implies the decision to leave other material This is the aspect of the remedy decision that has significant stewardship implications Proper consideration of these implications in implementing this RSOP can optimize the amount of stewardship required</p>	<p>The following text was added to Section 1 0, page 2, paragraph 3</p> <p>"The final cleanup levels and long-term monitoring requirements will be determined in the Corrective Action Decision/Record of Decision (CAD/ROD) However, it is anticipated that actions completed under this RSOP will result in a No Further Remedial Action determination (RFCA Part 5, paragraph av), and that the Comprehensive Risk Assessment (CRA) will show that no further action is required at sites remediated under this RSOP "</p> <p>A remedy decision evaluation is not included in the ER RSOP, the ER RSOP remedy is excavation Cleanup levels are not an implied decision under this RSOP Protective soil ALs were established by the RFCA Parties Implementation of this RSOP is based on those ALs coupled with the stewardship and ALARA</p>

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		<p>evaluations The agencies will participate in the decision of when to stop digging contaminated soil through the consultative process Language is being added to the RSOP to include a regulatory agency checkpoint prior to backfilling the excavations The Closeout Report is the formal approval of the accelerated action</p>
22	<p>Page 49, Section 5 2 1, Second Paragraph</p> <p>Add to end of 1<sup>st</sup> sentence</p> <p>where institutional controls are applied to any contamination above unrestricted use levels, and remediation may be required to eliminate contamination of surface water</p>	<p>The paragraph (now in Section 5 4 1) was modified to read "In accordance with RFCA, excavation to RFCA ALs is considered protective of human health and the environment for the anticipated land use Remediation under the ER RSOP will be conducted to the agreed-upon cleanup levels based on RFCA ALs with stewardship and ALARA considerations However, additional long-term stewardship considerations may impact cleanup decisions "</p> <p>Protection of surface water is an RAO and does not need to be included here as well</p>

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23	<p>Page 49, Section 5 2 1, Third Paragraph</p> <p>Split paragraph after 3<sup>rd</sup> sentence Add before split</p> <p>The evaluation will include estimates of soil removal required to reach unrestricted use levels, the cost of the additional soil removal, and a discussion of the uncertainty of the estimates for the planned work and the additional removal</p> <p>Add to last sentence in original paragraph, after "Closeout Report", insert "and the Annual Update to the Historical Release Report"</p>	<p>The following bullet was added to Section 5 4 1 <u>Monitoring</u></p> <p>"Will additional remediation reduce the cost of long-term monitoring?"</p> <p>The following text was also added</p> <p>"The benefit of conducting additional remediation to reduce long-term monitoring requirements will be evaluated during remediation in conjunction with the ALARA evaluation This evaluation will include a soil volume estimate, remediation costs, and disposal costs to reduce contamination to appropriate levels These costs will be compared to the cost of reducing long-term monitoring requirements Long-term monitoring costs will be described in the Stewardship Plan "</p> <p>The HRR will include information sufficient for the NFA discussion, however, the data will be documented in the Closeout Report</p>
24	<p>Page 49, Section 5 2 1, Fourth Paragraph</p> <p>Remove second bullet, and in 4<sup>th</sup> bullet replace "recommendations for" with "required"</p>	<p>The surface water evaluation was added to the stewardship evaluation so that it was not conducted twice Interim remediation goals are based on ALs, the stewardship evaluation, and the ALARA evaluation, therefore protection of surface water is taken into account</p>

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	<p>The benefit of having the surface water evaluation in the stewardship section of the ER RSOP is that all potential remediation sites will be evaluated as part of the Notification, not only those with ALs between Tier I and Tier II ALs</p> <p>The ER staff will recommend institutional or physical controls after remediation under this RSOP</p>	
25	<p>Page 50, Section 5 2 1, <u>Proximity to Other Contaminant Sources</u></p> <p>Replace 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> sentences with</p> <p>These impacts need to be considered in conjunction with remedy decisions in adjacent or surrounding areas. Thus, the remedy evaluation process will be broadened to incorporate evaluation of these areas as well as the primary area of focus. This evaluation will consider the different types of controls that may be required for different types of residual contamination. Thus, it may be reasonable to remove additional contaminated soil to an unrestricted use level even if the underlying groundwater is contaminated, as different controls apply to each media</p>	<p>The ER RSOP does not evaluate remedies, the ER RSOP remedy is excavation. A more complete description of the interface with long-term stewardship is provided in response to Specific Comment No. 1</p> <p>The text in Section 5 2 1 (now 5 4 1) <u>Proximity to Other Contaminant Sources</u> has been changed to the following</p> <p>“Surrounding and adjacent IHSS Groups may influence post-remediation impacts from IHSS Group remediations. These impacts are best considered in whole rather than individually so that institutional controls and monitoring requirements can be consolidated. Combining stewardship considerations for these areas could result in additional remediation and/or more effective stewardship actions especially if engineered controls are needed. For example, when an IHSS Group is isolated from other contaminant sources, additional remediation will be considered. This could result in a reduction of potential future institutional controls over large areas.”</p>

26	<p>Page 50, Section 5.2.1, <u>Surface Water Protection</u></p> <p>Remove section Surface water protection is required by RFCA as a primary remediation goal, therefore, it should be included in the remedy objectives rather than in stewardship. The description and approach in this subsection is flawed and needs to be reworked prior to inclusion in the remedy objectives section ALF states, "all final remedies must be designed to protect surface water for any use as measured at the nearest and/or most directly impacted surface water in Segments 4a/4b and 5."</p> <p>The second bullet attempts to limit surface water issues to areas in the buffer zone where erosion was identified as a contaminant pathway, however, this study did not address the IA. Therefore, the logic noted in the response is contradicted in the report language. Is this misdirection intentional?</p>	<p>The benefit of having the surface water evaluation in the stewardship section of the ER RSOP is that all potential remediation sites will be evaluated as part of the Notification, not only those sites with concentrations between Tier I and Tier II ALs. Additionally, the stewardship evaluation will be documented in the Notification and the Closeout Report.</p> <p>The ER RSOP does not include a final remedy.</p> <p>The text in <u>Surface Water Protection</u> has been changed to the following: "In the context of this RSOP, remediation to agreed-upon cleanup levels will be evaluated to ensure protection of surface water. Future RFCA decision documents regarding surface water quality may impact this RSOP approach. Surface water protection considerations include the following."</p> <p>Additionally, the second bullet has been deleted.</p>
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<p>27</p> <p>Page 52, Section 5 2 1, <u>Monitoring</u></p> <p>Remove 1<sup>st</sup> and 2<sup>nd</sup> bullets, this is part of the remedy evaluation for surface water as noted above</p> <p>Remove 2<sup>nd</sup> and 3<sup>rd</sup> paragraphs</p> <p>Third full paragraph (new), fourth line</p> <p>Replace "background" with "appropriate "</p> <p>Fourth paragraph</p> <p>Delete second sentence, delete fourth sentence</p>	<p>The benefit of having the monitoring evaluation in the stewardship section of the ER RSOP is that all potential remediation sites will be evaluated as part of the Notification, not only those sites with concentrations between Tier I and Tier II ALs. Additionally, the stewardship evaluation will be documented in the Notification and Closeout Report</p> <p>The word "background" was replaced with "appropriate "</p> <p>The second and fourth sentences in the fourth paragraph were deleted</p>
<p>28</p> <p>Page 55, Section 5 2 1, <u>Institutional Controls</u></p> <p>1<sup>st</sup> bullet Ownership is not a control without explicit control mechanisms Explain or delete</p> <p>2<sup>nd</sup> bullet The State covenant may be applicable, does DOE accept this as a control mechanism? If not, delete reference</p> <p>3<sup>rd</sup> bullet What is the mechanism for implementing these controls Identify or delete</p> <p>4<sup>th</sup> and 5<sup>th</sup> bullets Fencing is a physical control, move to engineered controls section</p> <p>6<sup>th</sup> bullet The maps and documents define where controls are required, but are not in themselves a control Move</p>	<p>Section 5 4 1, Institutional Controls, lists anticipated long-term controls, but does not describe these controls or how they will be implemented, because long-term sitewide stewardship requirements are not appropriate for accelerated actions</p> <p>The interface with long-term stewardship that was agreed upon at the November 1, 2001, meeting between DOE, CDPHE, EPA, and K-H, is described in response to Specific Comment No 1</p> <p>The fourth and fifth bullets will be moved to the engineered controls section which was renamed "Physical Controls "</p> <p>The sixth bullet was removed Documentation is included in the section on Ongoing Site Management Activities</p>

	<p>this to ongoing site management activities section</p> <p>It is unclear what controls will be used to implement restrictions in lieu of completing the remedies The “Other Site work control processes” do not appear to be included in the ARARs</p> <p>It is unclear why you consider fences and signs physical controls in the long-term, but institutional controls in the near-term</p>	<p>Routine health and safety and security controls will be used Site work controls are not ARARs</p> <p>The text was revised as follows “Besides continued restricted Site access, institutional controls will be used for near-term management and long-term stewardship It is anticipated that near-term and long-term controls will likely consist of the following</p> <ol style="list-style-type: none"> <li>1 Federal ownership (either DOE or the U S Fish and Wildlife Service),</li> <li>2 Land use restrictions by deed and/or covenant, and</li> <li>3 Permanent restrictions on groundwater and onsite surface water use ”</li> </ol> <p>The second paragraph and bullets were removed</p>
29	<p>Page 55, Section 5 2 1, <u>Engineered Controls</u></p> <p>Replace 1<sup>st</sup> sentence with “Engineered controls are expected to be a part of many remedies ”</p> <p>Physical controls are anticipated in the context of this RSOP where contamination is not completely removed through excavation, but additional controls are required Remove third sentence (The need for ) and three accompanying bullets, or the evaluation criteria should be discussed and expanded</p> <p>Remove last paragraph</p>	<p>There is no evidence at this time that engineered controls are expected to be part of many of the excavations</p> <p>The third sentence and accompanying bullets were removed</p> <p>The phrase “engineered controls” in this section was changed to “physical controls ”</p>

30	<p>Page 55, Section 5 2 1, Ongoing Site Management Activities</p> <p>Beginning with this subsection up to Section 5 5, ALARA, it is unclear that these subsections add any value to the document Deletion of these appears easier than resolving language</p>	<p>The section was deleted The Confirmation Sampling and Documentation subsections of this section were combined as appropriate in a new section on <u>Documentation</u> The section on Sitewide Studies was retained</p>
31	<p>Page 59, Actinide Migration Evaluation, Fourth Bullet</p> <p>The referenced report is not a quantitative evaluation of uranium transport in ground water Sorption is a reversible process which should be measured as adsorption and desorption to obtain realistic rates with which to model the mobility of this contaminant Uranium transport modeling is not a currently funded project under the AME, therefore it is unclear how the site will obtain this information in time to apply it to decisions made under this RSOP</p>	<p>The fourth bullet was deleted</p>
32	<p>Page 61, Section 5 3, Second Paragraph</p> <p>Delete 2<sup>nd</sup> and 3<sup>rd</sup> sentences</p>	<p>The second and third sentences of Section 5 5, second paragraph, were deleted</p>
33	<p>Page 63, Section 5 3 1, First paragraph</p> <p>Add to end of 1<sup>st</sup> sentence "when coupled with access restrictions "</p>	<p>The phrase "for the appropriate land use" was added to the end of the first sentence in Section 5 5 1</p>

	Delete 2 <sup>nd</sup> and 3 <sup>rd</sup> sentences	The second sentence was deleted  The third sentence was not deleted because it states the purpose of the ER RSOP ALARA evaluation
34	Page 63, Section 5 3 1, Second Paragraph  Delete 4 <sup>th</sup> and 5 <sup>th</sup> sentences	The fourth and fifth sentences were deleted
35	Page 64, Section 5 3 1, Technical Feasibility Evaluation  Neither of these points is meaningful Either come up with meaningful parameters or use a general statement such as, “Technical feasibility will depend on the specifics of the contamination, the work processes required to continue the remedy, area- and weather-specific factors, and other technical considerations appropriate for that work ”	The text was changed to the suggested text with the following modifications  “Technical feasibility will depend on the specifics of the contamination, the work processes required to continue the <del>remedy</del> <u>remediation</u> , area- and weather-specific factors, and other technical considerations appropriate for that work ”
36	Sec 5 3 1 <u>Cost Evaluation</u>  Add “The evaluation will include estimates of the cost of the additional soil removal, and a discussion of the uncertainty of the estimates for the planned work and the additional removal”	The text in Section 5 3 1 (now 5 5 1), <u>Cost Evaluation</u> , was changed to the following  “For the purpose of the ER RSOP ALARA analysis, the evaluation will include estimates of the cost of additional soil removal and will include the following criteria ”  The sentence “The uncertainty of the estimates will be informally addressed through the consultative process” was added at the end of the section

37	<p>Page 73, Section 6 5 1, Last Paragraph</p> <p>Add to the last sentence “ and anticipated future site use ”</p>	<p>The text was changed to the following “ stabilized and revegetated in accordance with Section 6 1 1 4 ” Section 6 1 1 4 has been revised to clarify that remediated areas in the IA will have a temporary vegetative cover, while areas in the BZ will have a native plant vegetative cover</p>
38	<p>Page 75, Section 6 5 3</p> <p>This section should specify that closure of RCRA units under this ER RSOP will comply with the permit closure plan or the interim status closure plan, as appropriate.</p> <p>Table 5</p> <p>Unit 18 04 is a gravel-covered lot without an asphalt pad as described in Table 5</p> <p>Figure 16 does not accurately show the boundaries of RCRA Units 15 and 750 1 The boundary for each of these units is the fence surrounding the respective asphalt pad Figure 16 should also show the locations of interim status RCRA Units for which ER will have responsibility for closure</p>	<p>The closure requirements described in Section 6 5 3 are identical to the closure requirements described in the Site’s approved RFCA decision documents, including all the Decommissioning Operations Plans (DOPs) and the other RSOPs (e g , RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities)</p> <p>RCRA Unit 18 04 is a gravel area, south of Unit 14, Building 906 Waste Storage Facility Table 5 (now Table 6) has been clarified by adding “Building 906” before “Waste Storage Facility” Additionally, the text was rewritten as follows</p> <p>“RCRA-regulated waste is currently stored at the 750 Pad (IHSS Group 700-8), 904 Pad (IHSS Group 900-3), asphalt pads east of Building 551, PACS 1 and the Remedial Action Decontamination Pad (RADP), concrete slabs at Building 788, and the Pondcrete Pump House, as well as the gravel area south of the Building 906 Waste Storage Facility The waste management organization is responsible for removing the waste at these units ER staff is responsible for characterizing and remediating asphalt, concrete,</p>

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	<p><b>Third Paragraph</b></p> <p>The document states, "The NPWL units consist of 26 tanks, 20 valve vaults, and associated piping. The NPWL pipes and tanks are part of RCRA Unit 374 3." If these 26 tanks are not the permitted tanks in Building 374 (which are covered by the DOP for Buildings 371/374), then they are not part of Unit 374 3. The tanks associated with the NPWL outside of Building 374 are interim status tanks and are assigned different RCRA Unit numbers. If this is the case, these RCRA units need to be identified on Table 5 and on Figure 16</p> <p><b>Fourth Paragraph</b></p> <p>The last paragraph on page 76 indicates that the Centralized Waste Storage Facility concrete pad is the responsibility of ER. The Centralized Waste Storage Facility is identified in the RCRA Permit as Unit 14 and should be listed as such on Table 5 and on Figure 16 if it is the responsibility of ER</p>	<p>soil, and debris beneath the units</p> <p>The following text has been added after the second sentence in Section 6 5 3 "Detailed drawings and figures of RCRA Units will be included in the Notification "</p> <p>The text in the second paragraph has been rewritten as follows "The NPWL pipes and valve vaults are part of RCRA Unit 374 3 "</p> <p>Additionally, Table 6, column 5, row 1 was changed to read as follows "Close parts of this unit not covered by the RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities (DOE 2001c) "</p> <p>The phrase "south of the" has been added before Building 906 Waste Storage Facility to clarify the location of Unit 18 04</p>
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39	<p>Page 78, First Paragraph</p> <p>The first sentence states that this RSOP will serve as the "permit modification vehicle for closure" of these RCRA units. It would be more appropriate to use the applicable Closure Reports to serve that purpose. The closure certification could also be submitted together with the Closure Report. The text should state that this certification should be submitted to the State, not the "LRA", since the State has authority over the RCRA Permit.</p> <p>Under <i>Unit Removal Without Onsite Treatment</i>, the sentence, "Waste will be stabilized or treated to meet regulatory or receiver site requirements" needs to be amended to require LRA concurrence for such treatment.</p>	<p>The closure certification will not be submitted with the Closeout Report. The closure certification may require additional information not contained in the Closeout Report. The closure certification will be submitted as soon as possible after all closure activities are complete.</p> <p>Text was changed to indicate that the certification will be submitted to CDPHE.</p> <p>The phrase "After the waste is shipped offsite," was added to the beginning of this sentence.</p>
40	<p>Page 91, Section 6.6</p> <p>After the first set of bullets, it should be noted that certain subsurface features left by D&amp;D may not be suitable for removal under this RSOP, such as the B123 Cesium Pit and the B779 sumps.</p>	<p>The removal of these structures is considered routine. If a different remedy is required, it will be covered under a different decision document. See response to Specific Comment No. 16.</p>
41	<p>Page 94, Section 6.8</p> <p>Add a description of how structures left in place or long-term requirements will be integrated into the site data base, IMP, CAD/ROD and Stewardship Plan.</p>	<p>See response to Specific Comments Nos. 1, 19, and 53.</p> <p>USTs left in place will be listed in the HRR.</p>

42	<p>Page 95, Section 6 9, Second Paragraph</p> <p>Add to the end of the first sentence, " unless significantly different from the original problem "</p> <p>Page 95, Section 6 9, Third Paragraph</p> <p>Note that contamination requiring remedies not consistent with this RSOP may require a separate decision document</p>	<p>The area will be added to the AOC during characterization regardless of any potential remediation If the area is found during remediation and requires excavation, it will be included in the AOC</p> <p>The following text was added to Section 6 9, fourth paragraph, as the second to last sentence "If a different remedy is required (e g, groundwater remediation), it will be covered under a separate decision document "</p>
43	<p>Page 97, Section 6 11 1</p> <p>Following the bullets, add, "Section 8 4 of the RSOP for Concrete Recycling specifies procedures necessary to use concrete for backfill in areas not approved in the RSOP "</p>	<p>The following text was added "Section 8 4 of the RSOP for Concrete Recycling (DOE 1999d) specifies procedures for using concrete as backfill "</p>
44	<p>Page 97, Section 6 11 2</p> <p>It does not appear that the removal of onsite soil as fill is addressed in the Environmental Consequences section This implies that such future use would require additional environmental evaluation</p>	<p>The RSOP states that onsite soil from remediation excavations may be used as backfill The following text was added "Onsite soil from other sources will not be removed for the purpose of backfill "</p>
45	<p>Page 99, Section 6 13, Tenth Bullet</p> <p>Replace with, "Required long-term actions, including at a minimum access restrictions, monitoring, operating requirements, and maintenance "</p>	<p>"Recommendations" is the appropriate word Please see response to Specific Comment No 1</p>

46	Page 107, Table 8 What is the procedure to be used to characterize and disposition sediments collected in these processes?	If sampling is required, the ER standard operating procedures for soil and/or sediment sampling will be used to characterize these sediments for dispositioning
47	Page 131, Section 13.1 Environmental Consequences should include consideration of where soils contamination is left, therefore restricting uses and potentially impacting resources	The Environmental Consequences for the ER RSOP include consideration of the action to remove soil, not residual contamination. Residual contamination will be evaluated in the CRA
48	Page 135, Section 13.3 The removal and plugging of pipes will also influence groundwater flow, possibly affecting seeps and habitat Add a statement that the removal and plugging of pipes will also influence groundwater flow, possibly affecting seeps and habitat	The removal and/or plugging of pipes is being modeled in the SWWB The following text was added to the end of the second sentence in the second paragraph "and the removal and plugging of pipelines, which could affect seeps and habitats "
49	Page 138, Section 13.6, Second Paragraph Bedrock formations at the site are fossil bearing and may weather out into the colluvial deposits which may be subject to soil remedial activities. A mammal fossil was found during construction of the East Trenches Plume collection system	Existing Site procedures will be followed if significant fossils are found during remediation

50	Page 142, Sections 13 13 and 13 14 These sections fail to address loss of resource due to incomplete removal of contamination	The Environmental Consequences for the ER RSOP include consideration of the action to remove soil, not residual contamination Residual contamination will be evaluated in the CRA
51	Page 143, Section 14 0 This section does not adequately address how information collected for and during remediation will be managed so as to be available for implementing long-term requirements or for other post-closure uses	The issue of long-term protection of records transcends the ER RSOP It affects the DOE complex and is being discussed at the Headquarters level Procedures for long-term management of remediation information, as well as other Site records, is important and clearly belongs in the Stewardship Plan

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	EPA Comments, October 24, 2001 General Comments	Response
1	<p>EPA's greatest concern with this document is that it proposes that DOE send a notification letter to the agencies that is neither approvable nor timely. EPA and CDPHE need to be notified after characterization has occurred of DOE's determination regarding areas to be remediated, and conversely, if no further action is being proposed. This notification also must be approvable rather than just a notice of DOE's decision. Specific language is included below to revise the document and the process that is being proposed.</p>	<p>Based on discussions and agreements reached at the November 1, 2001, meeting of DOE, CDPHE, EPA, and K-H on the ER RSOP Notification, CDPHE and EPA will have 14 calendar days to review the Notification. The regulatory agencies can approve all or part of the Notification. This will allow work to continue if specific issues require resolution.</p> <p>This text, along with a list of what will be included in the ER RSOP Notification, was added to Section 1.4</p> <p>Based on additional discussions and agreements with the regulatory agencies the following text was also added: "The LRA will approve or disapprove the Notification for each IHSS or IHSS Group addressed in the Notification within 14 calendar days after submittal. Any disapproval shall state, with specificity, the changes required to obtain LRA approval, and DOE may resubmit the Notification for 14 calendar day review and approval after making the changes. DOE may also invoke the dispute resolution process in accordance with RFCA, Part 15, Resolution of Disputes, Subpart B, for a disapproval or when the LRA fails to respond within 14 calendar days."</p> <p>The ER RSOP Notification will include the following:</p> <ul style="list-style-type: none"> <li>• Map of IHSS/PAC/UBC site that may require remediation,</li> <li>• List of COCs,</li> <li>• Basic project assumptions,</li> <li>• Stewardship analysis,</li> </ul>

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	<ul style="list-style-type: none"> <li>• Accelerated action remediation goals,</li> <li>• Treatment (if necessary),</li> <li>• Project-specific monitoring (if any),</li> <li>• RCRA Units and intended waste disposition, and</li> <li>• Projected schedule</li> </ul> <p>The Notification consultative process will include the following activities</p> <ul style="list-style-type: none"> <li>• RFETS staff and the LRA will consult on what the Notification will include,</li> <li>• RFETS staff will prepare the Notification for regulatory agency review, and</li> <li>• RFETS staff and the regulatory agencies will attend a briefing to discuss and come to agreement on the Notification at the briefing</li> </ul> <p>This text was added to Section 1 4 Notification</p>
	<p><b><u>Specific Comments</u></b></p>
1	<p>Page 2, Introduction</p> <p>The third key consideration discusses nonroutine remediation actions and ends by including “perhaps, a portion of the Original Process Waste Lines, OPWL” This ending phrase is too vague and either needs to be rewritten for better clarification, specifying which portions of the OPWL are non-routine or it should be deleted Another alternative would be to cite a portion of the document that would go into specific detail regarding</p> <p>The phrase “perhaps, a portion of the Original Process Waste Lines” in the last sentence in Section 1 0, page 2, bullet 3 was removed Based on discussions at and agreements reached on the November 1, 2001, meeting of DOE, CDPHE, EPA, and K-H, the ER RSOP was clarified regarding the OPWL</p> <p>Additional text was added to clarify that excavation of OPWL in IHSSs, PACs, and UBC Sites and OPWL outside of IHSSs, PACs, and UBC Sites is covered under the ER RSOP This</p>

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	routine versus non-routine remediation actions	remediation includes sealing of pipe ends OPWL remediation that is not excavation, (i.e., not the RSOP remedy) will be covered under a separate decision document  Additional text and a new diagram was added to Section 5.0 to clarify "routine"
2	Page 3, Section 1.2, Regulatory Framework  Clarification is needed for the second to last sentence on this page which states that "subsurface soil interim cleanup goals are equal to the agreed-upon cleanup levels" Reference to cleanup goals and agreed-upon <u>cleanup levels</u> is confusing This sentence should read like the previous sentence that discusses surface soil <u>interim cleanup levels</u>	We agree that this phrase is not precise, however, it is used to cover potential changes to the RFCA Tier structure and other changes to ALs Subsurface soil interim cleanup goals will be based on the agreed-upon cleanup levels
3	Page 4, Section 1.4, ER RSOP Notification  The agencies need to be able to approve the specific areas that DOE will propose to be remediated (or not remediated as the case may be) As described here, the notification letter has little function, since it does not commit DOE to remediation of any specific area, but only restates the areas where DOE is planning characterization activities that may or may not lead to remediation The notification letter should not be issued until characterization data has been collected and evaluated as per the IA SAP or BZ SAP Therefore, EPA proposes that the notification letter be sent to the agencies <u>after</u> characterization sampling has been performed and that the	Based on discussions at and agreements reached at the November 1, 2001, meeting of DOE, CDPHE, EPA, and K-H on the ER RSOP Notification, CDPHE and EPA will have 14 calendar days to review the Notification The regulatory agencies can approve all or part of the Notification This will allow work to continue if specific issues require resolution No response from the regulatory agencies during the 14-day period implies approval  This text, along with a list of what will be included in the ER RSOP Notification, was added to Section 1.4  Based on additional discussions and agreements with the

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<p>letter include maps that will specifically delineate where remediation will occur or recommend that no further action is necessary at the specific locations(s) that has been characterized. This must be subject to agency approval, but can be done in a timely manner, (ten working days), so that the process as envisioned can proceed efficiently. The notification letter must also state which remedy of those presented in the document has been chosen for the particular soil that has been characterized. Section 1.4 should be rewritten as:</p> <p>A notification letter will be prepared by DOE's contractors and sent to EPA and CDPHE after the characterization data for each IA or BZ group is collected and evaluated. This letter shall include a map(s) showing any area(s) being proposed for remediation, including the locations and concentrations of contaminants of concern. It shall also specify the particular remedial action that is being proposed. If no further action is being proposed rather than remediation, this must be justified through summary data tables, maps and text that document the necessary data aggregation and evaluation steps specified in the SAPs. The notification letter must also address stewardship and ALARA issues as presented in the appropriate sections of this document and depicted in Figure 8. If DOE submits notification for multiple areas to be remediated, it will also provide a schedule for these actions so that the agencies may prioritize review efforts. For any areas that are remediated, a</p>	<p>regulatory agencies the following text was also added "The LRA will approve or disapprove the Notification for each IHSS or IHSS Group addressed in the Notification within 14 calendar days after submittal. Any disapproval shall state, with specificity, the changes required to obtain LRA approval, and DOE may resubmit the Notification for 14 calendar day review and approval after making the changes. DOE may also invoke the dispute resolution process in accordance with RFCA, Part 15, Resolution of Disputes, Subpart B, for a disapproval or when the LRA fails to respond within 14 calendar days."</p> <p>"Notification <u>after</u> characterization sampling has been performed" is contradictory to the in-process sampling strategy</p>
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	subsequent notification of completion will be necessary that includes results of confirmation samples collected after remediation and presented as specified above All notifications are approvable documents and the LRA shall have ten working days in which to make a determination of approval or disapproval DOE may not proceed without written consent (hard copy or electronic transmittal) from the LRA	
4	<p>Page 5, Section 2 1, RFCA Consultative Process</p> <p>The Remedial Action Decision Management System (RADMS) is briefly mentioned at the bottom of this page, and it is stated that data tables and maps through this system will be provided to offsite regulatory offices Will the agencies be able to view these tables and maps electronically via the internet? If so, will the public also have access to the data?</p>	<p>The regulatory agencies will have complete access to all data and system capabilities at their onsite offices at RFETS The regulatory agencies will have access to static data and maps via ISEDs at offsite offices As with SWD, the public will not have access to RFETS databases</p>
5	<p>Page 8, Table 1, Regulatory Agency Oversight of the ER RSOP Accelerated Actions</p> <p>As shown in this table, it appears that DOE would be the only party to initiate modifications to the SAPs This should be modified so that it is clear that EPA and CDPHE may also initiate modifications if deemed necessary</p>	<p>Modifications will be initiated through the consultative process, consistent with RFCA</p>
6	<p>Page 9, Table 1 a/a</p> <p>Issuance of a stop work order is listed as an agency</p>	<p>Stop work authority and when it can be implemented is clearly</p>

	checkpoint What are the circumstances or grounds for issuing a stop work order? The appropriate document should be cited	defined in RFCA, Part 14
7	<p>Page 62, Table 4, ARAR Requirements</p> <p>Three columns are shown on this table Please explain what the middle column is titled "Section" refers to In some cases, the third column only lists the decision document without specifying a section or page number Page numbers or sections should be listed for all documents that are available so that the table can be more easily utilized</p>	Table 4 was clarified
8	<p>Page 64, ALARA Evaluation, Cost Evaluation</p> <p>How will this cost evaluation actually be done? Is DOE planning to show the cost involved for remediation and the incremental costs that would be incurred for remediation to different levels? Without showing actual costs, it does not seem that cost considerations could be adequately evaluated More detail is needed to explain how this will be accomplished</p>	DOE Orders specify that ALARA cost evaluations should be qualitative rather than quantitative Qualitative evaluation will be performed in consultation with the regulatory agencies
9	<p>Page 65, Summary Accelerated Action Decisions</p> <p>Additional language needs to be added to this section to reflect that the key decisions which are listed will be approvable by the agencies through the notification letter</p>	The first three decisions will be approvable in the Notification, the fourth will be a concurrence before backfilling, as agreed to at the November 1, 2001, meeting Additional language was added

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	process as described above	to the ER RSOP to clarify this concept
10	<p>Figure 13, Accelerated Action Summary</p> <p>This figure needs revision to reflect that the notification letter will follow characterization and include stewardship considerations as well as the ALARA evaluation, as described above</p>	<p>As agreed to at the November 1, 2001, meeting, Notifications will be developed periodically throughout the year and the in-process sampling strategies require notification prior to characterization in most cases. Stewardship and ALARA considerations are included in the Notification</p>
11	<p>Pages 71-72, Remediation Maps, Section 6.3</p> <p>This section very briefly describes the very important process that will be used to develop remediation maps from characterization data and states that the data will be presented using the ER data management system, aka RADMS. In order to better understand this process, EPA needs to see an example of the full process, and the data management system, RADMS, must be used to provide this example so that the agencies can see exactly what is being proposed and how it will work</p>	<p>RADMS was presented to the regulatory agencies on November 5, 2001</p>
12	<p>Page 73, Soil and Debris Remediation, Section 6.5</p> <p>The first paragraph states that soil remediation through excavation was successful at Trench 1 and other locations at RFETS. EPA agrees with this but at the same time, it proved to be more difficult than expected to find facilities which would accept some of the wastes that were excavated from Trench 1. Are any of these wastes still being stored onsite, and if so, to what facilities will they</p>	<p>The project shipped what it could but there are some wastes remaining onsite, including</p> <ul style="list-style-type: none"> <li>• 100+/- drums and 30+/- half-crates of waste contaminated with PCBs, heavy metals, and organics, the waste is also pyrophoric. Currently, there is no available facility to treat and dispose of this combination of waste</li> </ul>

	be sent and when will this occur?	<ul style="list-style-type: none"> <li>10+/- full crates of soil above LDRs awaiting shipment for treatment and disposal</li> </ul>
13	<p>Page 98, Stabilization, Section 6.1.1.4</p> <p>Canada Bluegrass, a non-native species, is listed as the grass seed that will be applied to the topsoil after backfilling. Since RFETS actually has large areas of native prairie that should be preserved, including some rare (for Colorado) tallgrass varieties, native species seed mixtures must be used for all revegetation efforts that would complement existing prairie. DOE must list other species that it will use for this effort.</p>	<p>Canada bluegrass will be used to temporarily revegetate remediated areas in the IA that will be disturbed at a later date for the final IA regrading. Canada bluegrass was chosen because of the following: (1) it can provide a low-maintenance temporary cover, (2) it can establish much more quickly than native species, (3) it is already well established within the native grasslands at the Site, (4) it is apparently not an aggressive invader under our soil and climate conditions, and (5) it is considerably less expensive than native species. Once the IA is regraded in preparation for final revegetation with native species, residual Canada bluegrass seed will not be nearly as aggressive in competition with the newly planted grasses as some undesirable species such as smooth brome. If remediation locations are not temporarily vegetated, other soil stabilization or weed control measures will have to be applied at a greater cost, with a need for constant maintenance.</p> <p>Remediated areas in the BZ will be reseeded with native mixtures.</p> <p>The final vegetation cover seed mixture and seed mixtures for remediated areas in the BZ will be determined on a case-by-case basis, depending on the actual location. The two main plant community types that DOE will attempt to reestablish will be a</p>

		<p>xeric tallgrass type community that will be the type over most of the IA, and a mesic mixed type community that will be appropriate for hillside areas (e.g., north of the Solar Ponds) If riparian areas will be impacted, those plant communities will require more intensive revegetation with appropriate species for those areas</p> <p>Additionally, different species may be needed at capped areas to meet the requirements of the caps. Each project will have its own individual seeding instructions with the seed mixture tailored to the location, soil type, and soil moisture conditions. Permanent seed mixtures and instructions will be documented in work controls</p>
14	<p>Page 99, Closeout Report, Section 6.13</p> <p>Rather than submit all closeout reports at the end of each fiscal year, it would make more sense to submit them within a month of the completion of each IHSS Group remediation</p>	<p>The text was revised to indicate that the Closeout Report will be prepared on an IHSS or IHSS Group basis</p>
15	<p>Page 117, Soil Surface FIDLER Readings &gt; 5,000 CPM, Section 9.4</p> <p>This section describes a process to be followed when FIDLER readings exceed 5,000 CPM without explaining why this level of radioactivity detected by this particular instrument triggers a change in action. The document must briefly explain the significance of exceeding 5,000 cpm as seen by the FIDLER in terms of already established action levels or health and safety guidelines</p>	<p>ER staff uses this value as a field screening tool to determine whether additional work controls may be needed. The FIDLER is used in conjunction with other instruments to determine if additional work controls are required. The FIDLER measures counts per minute of the area, but cannot be translated into pCi/g of soil. HPGs will be used to measure pCi/g</p>

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		Text was added to the ER RSOP to clarify these concepts
16	<p>Page 117, Air Sample Results &gt; 10% DAC, Section 9 5</p> <p>The document must specify what instrument will be used for the air sampling discussed in this section and whether or not it is capable of providing real time analytical results</p>	<p>Specific airborne radiation monitoring requirements will be detailed in the work control documents such as the radiological work permit At this time, it is expected that air monitoring will be conducted using low or high volume air samplers, and may include CAMs if the conditions warrant While these samplers are not capable of providing real time analytical results, these samplers are sufficient for the purposes of ensuring worker safety and detecting significant releases to the environment</p>
17	<p>Page 122, Offsite Treatment and Disposal, Section 10 3</p> <p>This section lists all of the different categories of wastes that may be encountered and mentions that most types will be disposed of in K-H approved facilities, without identifying specifically which facilities are being considered for most categories The specific names and locations of facilities that might be used for each category of waste should be listed, either in a table format or in each section that discusses the various categories of waste</p>	<p>The list of specific facilities that may be approved by K-H to receive ER waste changes continually as new facilities are identified and as facilities' abilities to accept various waste streams and their cost-effectiveness changes A list of facilities that currently accept RFETS waste would not accurately identify facilities that may be approved to accept ER waste in the future Additionally, K-H cannot identify facilities not currently on the list, which may potentially be used in the future, before RFPs are issued and contracts are in place</p> <p>Material Stewardship has the responsibility for identifying appropriate waste disposal facilities and maintaining compliance with the disposal site Waste Acceptance Criteria</p>

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Response to Comments – Draft RSOP for Routine Soil Remediation

	U.S. Fish and Wildlife Service Comments, October 24, 2001	Response
	<u>General Comments</u>	
1	Overall, the RFCA Standard Operating Protocol (RSOP) is clear and straightforward	No response required
2	The Soil Action Levels (RFCA Attachment 5) are based only on human health criteria DOE needs to compare Soil Action Levels to ecological benchmarks that were prepared for the watershed ecological risk assessment. The watershed ecological risk assessment estimated that there is a potential risk to ecological receptors in the watersheds. Before or during remediation, a similar screening-level ecological risk assessment should be undertaken for the industrial area to determine if there is or will be potential risk to ecological receptors. This may modify final decisions during soil remediation, such as, to continue remediation or not.	Remediation will be conducted using both human health and ecological-based remediation goals.  As discussed in the Draft CRA Methodology, ecological screening values will be developed for the IA based on recent EPA guidance. Until that time, the following actions will be taken: (1) erosion controls will be used as necessary around remediation projects to mitigate impacts to watersheds, and (2) human health- and ecology-based remediation goals will be compared to identify those COCs that are more restrictive for ecological receptors.
	<u>Specific Comments</u>	
1	Executive Summary, page E-2, first paragraph – It states “Confirmation sampling will verify that remediation goals have been met” When will the remediation goals be determined? DOE currently has soil action levels, but remediation goals have not been established. Remediation goals also need to take into account any ecological receptors that may be affected by contamination.	In accordance with RFCA, RFCA ALs are interim cleanup goals for accelerated actions.  Remediation goals will be established for ecological receptors following completion of an ecological screen of the BZ and IA.



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2	Section 1 1, page 3, first bullet – No RFCA cleanup goals have been set	In accordance with RFCA, RFCA ALs are interim cleanup goals for accelerated actions
3	Section 1 2, page 3, third paragraph – The action levels have been based only on human health CERCLA and RCRA require cleanup to protect human health and the environment Final remedy needs to include ecological receptors as well as humans See general comment #2	The final remedy will consider impacts and risk to ecological receptors  See response to General Comment Nos 2 and 3
4	Section 1 4, page 4 – If/When the Rocky Flats National Wildlife Refuge legislation passes, the U S Fish and Wildlife Service (Service) should also get a copy of the official notification when the lead regulatory agency is notified	DOE will provide the Service with copies of ER RSOP Notifications
5	Section 2 1, page 5 – If/When the Rocky Flats National Wildlife Refuge legislation passes, the U S Fish and Wildlife Service (Service) will want an increased participation in the consultative process with the principles	If/When the Rocky Flats National Wildlife Refuge legislation passes, DOE and the Service will sign an MOU to describe both DOE and Service roles and responsibilities
6	Section 2 1, page 5, second set of bullets – The Service would like access to all site-wide environmental databases, including but not limited to SWD, ISEDS, and RADMS	DOE will provide the Service access to SWD, ISEDS, and RADMS If/When the Rocky Flats National Wildlife Refuge legislation passes, DOE will provide the Service with access to other information sources agreed to in an MOU
7	Section 2 2 1, page 7, third paragraph – The Service should also receive IASAP and BZSAP Addendum, when they are submitted to the lead regulatory agency	DOE will provide the Service with copies of the IASAP and BZSAP addenda
8	Section 3 5, page 25 – May want to reconsider statement with pending refuge legislation	If/When the Rocky Flats National Wildlife Refuge legislation passes, the ER RSOP will be modified

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9	Section 4 4, page 31, second bullet – Power poles should be removed completely or cut off three (3) feet below grade, so they do not interfere with future management of the area	Power poles will be removed to grade unless they interfere with Site regrading or other actions
10	Section 4 4, page 31, last bullet – For clarification, “Clean” should be added to the beginning of the sentence	“Clean” was added to the beginning of the second sentence of the bullet
11	Section 5 1 2, page 34, number 4 – When discussing subsurface soils, burrowing animals (mammals, birds, and invertebrates) and vegetation root systems need to be taken into account	The RAO includes ecological receptors The detail of determining ecological screening values is beyond the scope of the ER RSOP Exposure to subsurface ecological receptors will be addressed in the Ecological Screening Assessment See response to General Comment Nos 2 and 3
12	Section 5 2 1, page 49 second paragraph – RFCA soil action levels are based on human health criteria, it has not been demonstrated that they are protective of ecological receptors	See response to General Comment Nos 2 and 3
13	Section 5 2 1, page 55 Institutional Controls – The State of Colorado will be looking for something that is enforceable	As agreed upon in the November 1, 2001 meeting between DOE, CDPHE, EPA, and K-H, long-term stewardship implications (not requirements) will be identified when remediation under this RSOP is completed and recommendations made Enforceable long-term stewardship requirements are outside the scope of the ER RSOP because the ER RSOP covers accelerated actions and not final Site actions
14	Section 5 3, page 61, last paragraph – DOE Order 5400 5 includes ecological receptors, not just human health	See response to General Comment Nos 2 and 3
15	Section 5 3 1, page 63, first paragraph – RFCA soil action levels are based only on human health, not ecological receptors	See response to General Comment Nos 2 and 3

Response to Comments – Draft RSOP for Routine Soil Remediation

16	Section 5 3 1, page 64, third bullet – It sound like excavation will stop if deeper than 8 feet, is that true? Clarify sentence	Excavation will stop if it is unsafe for workers Eight feet is a health and safety evaluation point
17	Section 5 3 1, fifth bullet – It sounds like excavation will stop if larger than 1 acre, is that true? Clarify sentence	The Technical Feasibility Evaluation section was rewritten as follows “Technical feasibility will depend on the specifics of the contamination, the work processes required to continue the remediation, area- and weather-specific factors, and other technical considerations appropriate for that work ”
18	Section 6 11 4, page 98, first paragraph – Reference where the permanent vegetative cover is described	Reference to the Site vegetation management plans was added
19	Section 12 1, page 128 – See specific comment #6	DOE will provide the Service access to SWD, ISEDS, and RADMS If/When the Rocky Flats National Wildlife Refuge legislation passes, DOE will provide the Service with access to other information sources agreed to in an MOU
20	Section 12 1, page 128, last bullet – Does the risk screen in the data analysis section include an ecological risk screen? EPA has established one in their FIELDS/SADA computer program	The risk screen does not include an ecological risk screen The risk assessment module will include ecological risks
21	Section 12 1 2, page 130, risk screen – See specific comment #20	The risk screen does not include an ecological risk screen The risk assessment module will include ecological risks
22	Section 12 1 5, page 130, last sentence – Add the Service, too	The text was changed to include the Service
23	Section 13 2, bottom of page 132 and top of page 133 – “the spread of” is repeated	The second phrase “the spread of” was removed
24	Section 13 3 – Imported water is not discussed, but should have a big impact on the quantity of water remaining after	The reduction in the amount of available water at the Site after closure is being evaluated in the SWWB

Response to Comments – Draft RSOP for Routine Soil Remediation

	remediation	This should be discussed	
25	Section 13 5, first paragraph – I have not read the CID, so I cannot comment on the chemical impacts to ecological receptors in that document	The CID was recently approved and will be available in the AR	

Response to City of Broomfield Comments – Draft RSOP for Routine Soil Remediation

	<b>City of Broomfield Comments, October 5, 2001</b>	<b>Response</b>
	<b>General Comments</b>	
1	<p>The City of Broomfield appreciates the opportunity to review and comment on the Working Draft Environmental Restoration (ER) Rocky Flats Cleanup Agreement (RFCA) Standard Operating Protocol (SOP) For Routine Soil Remediation, dated September 2001. Broomfield considers the ER RSOP to be a critical document that should be inclusive of explicit remediation project decisions and remediation activities, which may have the potential to impact human health and the environment both on-site and off-site near-term and long-term. Broomfield agrees there should be one document to streamline the decision making process and accelerate the remediation schedule by eliminating numerous review cycles to remediate soil and buried debris.</p> <p>Broomfield would like to thank the Site for addressing previous concerns associated with the initial draft and revising the draft to reassure the City that we are working collaboratively for a safe cleanup and closure of the Site. Broomfield also would like to acknowledge the effort the Site has made with Table 3, Applicable or Relevant and Appropriate Requirements. The City staff has very thoughtfully and thoroughly reviewed this crucial document and has both general concerns and specific comments associated with the document.</p>	No response required
2	<p><b>Routine versus Non-routine Activities</b></p> <p>Broomfield appreciates the response the Site provided in their letter dated September 4, 2001, related to the ER</p>	Remediation of contaminated soil and associated OPWL is covered under the ER RSOP if the remedy is excavation. If, for

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<p>RSOP The response stated <i>“Non-routine is an attribute ascribed to those remedial actions that require special engineering design and/or regulatory agency approval. These actions are not covered under the ER RSOP and include closure of the two landfills, the Solar Evaporation Ponds, the Industrial Area groundwater plume, the 903 Lip Area, and perhaps, a portion of the OPWL.”</i></p> <p>Clarify the criteria for determining a routine activity or non-routine activity for removal of OPWL. To operate within the scope of this document, it should be clearly understood prior to excavation of OPWL that the remediation is considered routine. Identify the specificities of the evaluation.</p> <p>The ER RSOP discusses the removal of tanks and/or drums. Clearly, if tanks or drums have been previously identified or characterized the City agrees the activity may be considered routine. Revise the document to state all unknown/uncharacterized tanks or containers that are encountered during excavation are not within the scope of the ER RSOP until the unknown conditions have been identified. Broomfield considers any activity encountering unknown tanks or containers to be non-routine due to additional Health and Safety criteria and additional characterization criteria associated with unknown containers or tanks. Revise the document to identify a hold point when unknown tanks and/or containers are encountered. Cite the potential documents the Site will use when unknown drums or tanks are encountered along with the notification process involved.</p>	<p>example the remedy is to “leave in place”, the remediation is not routine and would require different documentation. In this case, a PAM or IM/RA will be developed. The “different action” could also include a range of options that cannot be identified at this time. A new figure (Figure 8) that clarifies this concept was developed.</p> <p>Similar to the situation for the OPWL, finding drums or tanks is considered routine if the remediation for the drums and tanks is excavation. If, at any time, during remediation, excavation is not possible because a different remedy is needed, work will be stopped and a different decision document will be prepared (used).</p> <p>Protection of workers and the environment work controls require us to understand potential hazards and implement appropriate safety measures. Unknowns require work stoppage and evaluation to ensure we can proceed safely.</p> <p>Hold points that will be used when unknown tanks or containers are found are described in Section 9.2.</p>
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	<p>with these activities</p> <p>In addition, the document does not address the potential to encounter unusual physical characteristics such as discolored soils or odors. Define the protocol the Site has for encountering unusual characteristics. All activities within the scope of the ER RSOP will be utilizing either the IA SAP or the Buffer Zone SAP for characterization. Clearly, unknown material or containers will require complete characterization, therefore they will be outside of the scope of the ER RSOP. If the abnormal condition is rectified, the Site should continue under the auspices of the ER RSOP.</p> <p>Add a definition of routine and non-routine to the glossary</p>	<p>The potential for unanticipated hazards and conditions is addressed in the ER Health and Safety Plans and verified during the readiness assessment process. Briefly, project activities will pause when unanticipated hazards or conditions are encountered. Potential hazards or conditions are then evaluated to determine the severity or significance of the hazard or condition and whether the controls on the project are sufficient. Finally, a determination is made whether to proceed with controls currently in place, segregate the hazard or condition from the project activity, or implement additional controls to address the unexpected hazard or condition.</p> <p>A new section was added to describe routine and nonroutine decisions. A description of routine and nonroutine was added to the glossary.</p>
<p>3</p>	<p><b><u>Stockpiles</u></b></p> <p>The ER RSOP addresses the use of stockpiles to be used for storing backfill material. Storm water management is strategic to maintaining surface water quality. To prevent degradation of water quality, air quality, and ecological resources, Broomfield request the document be revised to include the following information:</p> <ul style="list-style-type: none"> <li>• Stockpiles containing <u>residual contamination</u> <ul style="list-style-type: none"> <li>➢ Identify where the piles will be staged</li> <li>➢ Identify the process to determine how the material will be dispositioned</li> <li>➢ Clarify how the material will be tracked if</li> </ul> </li> </ul>	<p>The text in Section 6.1.2 was modified to read “Excavated soil will be segregated by type and amount of residual contamination and will be staged in the IHSS, PAC, or UBC site where it originated.” Excavated soil may be staged on and covered with plastic tarps to prevent air dispersion pending use as backfill. “Additionally, BMPs will be used to prevent the potential spread of contamination. When soil is returned to a site, the residual contamination will be documented in the Closeout Report, and HRR, and the data records will be marked in SWD.”</p> <p>An evaluation of potential pathways and risks will be conducted during the CRA.</p>

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	<p>used as backfill (stewardship implications for records and documents)</p> <p>➤ Identify how the material will be segregated (i.e. by residual contamination and/or soil type)</p> <p>➤ Briefly identify the criteria for the management and operations of the stockpiles</p> <p>➤ Identify the Site document that identifies the criteria for the management and operations of the piles (SWP3)</p> <p>➤ Clarify how residual contamination will be integrated into the Comprehensive Risk Assessment (CRA)</p> <ul style="list-style-type: none"> <li>• Stockpiles containing <u>unrestricted release</u> material (clean) <ul style="list-style-type: none"> <li>➤ Identify where the piles will be staged</li> <li>➤ Identify the process to determine how the material will be dispositioned</li> <li>➤ Identify how the material will be segregated</li> <li>➤ Briefly identify the criteria for the management and operations of the stockpiles</li> <li>➤ Identify the Site document that identifies the criteria for the management and operations of the piles (SWP3)</li> </ul> </li> </ul> <p>It is vital to identify areas with remaining residual contamination at the Site to have the ability to identify potential exposure pathways To ensure the viability of</p>	
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	<p>data for stewardship implications, the following information should be included in the Site's records, 1) contaminant constituents, 2) sampling data, 3) type of soils, 4) placement location, 5) potential environmental pathways and 6) associated risks</p>	
4	<p><b><u>Stewardship Evaluation</u></b></p> <p>Broomfield continues to be apprehensive with the work planning and execution of remedial activities that may or may not capture a comprehensive stewardship evaluation. The City, along with other local governments, has on numerous occasions volunteered to assist the Site with the development of their Stewardship Plan due to the importance of protecting our communities and citizens. We thank you for incorporating a Stewardship section into the RSOP, but we are still unclear on the process and its' implementation during field operations. The ER RSOP states, "DOE is developing the <i>Stewardship Plan in consultation with the Stewardship Working Group</i>". Broomfield wants to emphasize the need to have local governments, which are asset holders involved with stewardship activities and policy decisions. The ER RSOP is the strategic document that identifies the activities for the core remedy selection for soils and debris that may impact adjoining communities. The RSOP does not clearly describe the stewardship evaluation that will be made prior to remediation and during remediation. To provide consistency to this routine activity, Broomfield suggests the Site develop a template to incorporate not only the remediation objectives, but also consider the nine CERCLA criteria during the stewardship evaluation.</p>	<p>Figure 8 (now 9) has been revised to clarify the process. Figure 8 (now 9) has been revised to indicate that an ALARA evaluation is conducted once before remediation begins and once after remediation has started. An additional ALARA evaluation is conducted because new information may be found during remediation.</p> <p>Additionally, the sequence of the ALARA and stewardship evaluations has been modified so that the final accelerated action stewardship evaluation is conducted after the final ALARA evaluation. This way, recommendations for institutional or engineering controls come after remediation is completed or remediation is stopped for ALARA considerations.</p> <p>The nine CERCLA criteria are used as part of the process to compare remedial alternatives. Because the ER RSOP has only one remedy, excavation, it is not needed in the ER RSOP or in the stewardship evaluation.</p> <p>DOE has agreed to include stewardship recommendations and implications for each completed accelerated action in the Closeout Report. Annually, a stewardship status report will be prepared summarizing the stewardship items from the individual Closeout Reports. These annual stewardship reports will be</p>

Response to City of Broomfield Comments – Draft RSOP for Routine Soil Remediation

	Broomfield understands the final stewardship analysis will be finalized once all the Site's studies are completed and integrated to achieve the end-state vision	incorporated into the RI/FS and serve as information for the remedy selection in the final ROD
5	<p><b><u>ALARA Evaluation</u></b></p> <p>The ER RSOP describes when the ALARA evaluation will be considered. If the ALARA evaluation performed prior to and during remediation is not intended as an ALARA analysis of final remedial actions, clarify the differences between the two evaluations. Broomfield is concerned with the concept of having two ALARA evaluation processes with discrete criteria. Define how the consultation process with the regulatory agencies will be implemented during the three proposed stages of ALARA. Define the distinction between the ALARA evaluation and the evaluation analysis. Add the definitions to the glossary.</p>	<p>There are two stages of ALARA evaluations in the ER RSOP: the initial planning ALARA evaluation and field implementation ALARA evaluation. The evaluation criteria are the same for each evaluation. Figure 8 (now 9) has been revised to clarify this evaluation process.</p> <p>All ALARA evaluations will be discussed with the regulatory agencies as part of the consultative process.</p>
6	<p><b><u>Evaluate or Manage</u></b></p> <p>Several flow charts identify an endpoint as "Evaluate or Manage". Clarify what analysis will occur during this process and identify what document will provide the criteria for the determination to evaluate additional remediation or management of an area. To ensure consistency with this routine activity, Broomfield requests a copy of the criteria for this endpoint and an explanation of how this decision will be made in the field.</p>	<p>RFCA Attachment 5, Sections 4.3 and 5.3, call for evaluation and/or management of areas with contaminant levels above Tier II ALs. While the term is not quantitatively defined in RFCA, it applies to the stewardship and ALARA concepts including protection of surface water. Figure Nos. 6, 7, 12 (now 13), and 13 (now 14) have been changed to show that "evaluate or manage" lead directly to the stewardship and ALARA evaluations.</p> <p>The result of "evaluate or manage" could include remediation, additional evaluation, monitoring, engineering controls,</p>

		institutional controls, or a combination of actions
7	<p><b><u>Surface Water Protection</u></b></p> <p>The document does not clearly define how the evaluation for surface water protection will transpire. If a pathway to surface water exists, how will the monitoring data be utilized to determine impacts? The RSOP discusses evaluating areas with high erosion potential based on the 100-Year Average Erosion Map. Will the Site also be evaluating areas with 25 or 50-Year average erosion? The document defines the last evaluation criteria which may include management actions such as <i>stabilization, monitoring, or best management practices</i>. Does the term monitoring reflect operational inspections or surface and groundwater network monitoring? Clarify the term monitoring.</p> <p>The document states, “If groundwater or surface water impacts are detected during remediation, performance monitoring will continue for a period of one-year. Additional monitoring may be required at sites that are not remediated to agreed-upon ALs or at areas that have the potential to adversely impact surface water. The evaluation criteria for determining whether additional monitoring is required are as stated above.” Define how groundwater or surface water impacts can occur if erosion controls are in place to prevent degradation of groundwater or surface water. Explain how the Site determined to use a period of one-year to perform additional monitoring. Clarify the statement that</p>	<p>The surface water evaluation is described in Section 5.4.1. An example of how monitoring data can be used to determine impacts is: If an IHSS has fluorine in the subsurface and immediately downgradient groundwater monitoring data indicate fluorine is not present, then the IHSS is not impacting the groundwater.</p> <p>The 100-Year Average Erosion Map is the most conservative because it is based on a 100-year flood, which is larger than a 25- or 50-year flood.</p> <p>Monitoring includes both routine compliance monitoring and monitoring around specific sites. The text in Section 5.2.1 (now 5.4.1), Monitoring, was clarified to include performance monitoring stations. Compliance monitoring and performance monitoring were added to the glossary.</p> <p>Erosion controls should prevent impacts due to erosion. However, as an extra control measure, monitoring results will be evaluated to make sure that no impacts occurred.</p> <p>The one-year time period was deleted at the request of CDPHE.</p> <p>Additional monitoring requirements may be recommended as a result of the stewardship evaluation. An example of this follows: Current surface water monitoring results indicate that surface water has elevated levels of fluorine in the Walnut Creek.</p>

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	additional monitoring may be required for sites that are not remediated to agreed-upon ALs Provide the City with a scenario to reflect this proposed situation	Watershed During remediation of a UBC on the northern side of the IA, excavation work was deemed unsafe by the health and safety manager because the excavation could not be tiered appropriately given that it was on a slope Because the work was stopped before all soil contaminated with fluorine was remediated, an additional surface water monitoring station was recommended at this location
8	<u>903 Pad</u> The City of Broomfield requests additional information related to the remediation of the 903 Pad The Site has alluded to possibly building a containment tent to control airborne contamination The Integrated Monitoring Plan (IMP) does not clearly identify the criteria for such an activity and Broomfield is concerned air monitoring issues have not been adequately addressed in the current IMP Broomfield requests to be apprised of proposed plans and schedules associated with the remediation of the pad as they are developed	The Cities will be informed of proposed plans for the 903 Pad through regular ER/D&D Status Meetings and at other regular forums The notification for each project will include proposed project-specific monitoring requirements
9	<u>Sitewide Studies</u> The Site is currently in the process of developing several documents that will have substantial contributions associated with stewardship assessments and the end-state vision The relevance of the Actinide Migration Evaluation study, the Site-Wide Water Balance study, and the Land Configuration Design Basis study all provide a mechanism to ensure the Site's closure goals have been obtained Broomfield would like to see a statement added	These documents will likely be summarized in several documents including the RI/FS and other documents as appropriate Text was added to the RSOP to clarify this concept

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	to the Sitewide Studies section committing to developing an integrated document to summarize the impacts from each study and their contribution to long-term post-closure stewardship goals	
10	<p><b><u>New Technology</u></b></p> <p>Per RFCA, the Agencies will continue to explore new technologies to make further cleanup possible. It is essential to continually explore the availability of new technology for source removal or stabilization. Between now and 2006 there may be new technologies developed to reduce waste generation, reduce costs, or stabilize contamination that would further an enhanced cleanup. Add a statement to the ER RSOP to ensure DOE will continue to explore new technologies associated with remediation, which will minimize the need for long-term maintenance and institutional or engineering controls</p>	<p>DOE continues to look for and evaluate potential technologies through EM-50 programs. New technologies will be used as proven technically and cost effective. A statement in the ER RSOP that new remediation technologies will be explored is not needed because the only remediation technology covered under the RSOP is excavation. Based on current research, it is not anticipated that new excavation technologies will emerge between now and 2006</p>
11	<p><b><u>Quality Assurance/Quality Control</u></b></p> <p>Finally, Broomfield would like to comment on the lack of information addressing Quality Assurance and Quality Control. Broomfield is disappointed to see such a critical document have a bulleted one-page discussion pertaining to Quality Assurance (QA) and no mention of Quality Control (QC). The ER RSOP states, "The ER Program QAPP will discuss in detail how these criteria will be implemented." Add a statement to identify the schedule</p>	<p>The current ER QAPP was effective as of 10/1/01</p> <p>The ER Program QAPP incorporates the requirements of DOE Order 414 1A, <i>Quality Assurance</i>, and 10 CFR 830 120, <i>Quality Assurance Requirements</i>. Both the DOE Order and regulation contain the same 10 quality criteria, which prescribe the quality standards necessary to meet the requirements of the RFETS Closure Contract. The QAPP describes how the ER Program will</p>

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	<p>for the proposed QAPP Clarify how QC and QA will be integrated and implemented to ensure compliance with the remediation activities Identify the aspects of the QA/QC program that will become part of the Closeout Report</p>	<p>implement the 10 quality criteria</p> <p>The QA/QC requirements associated with ER work processes are presented in the QAPP Specific requirements are described for sampling and analysis, radiological surveys, analytical chemistry and isotopes, and remedial activities All final designs, documents, quality records, and computerized data will undergo validation through peer review, commensurate with the scale, cost, specialty, and hazards of the item or activity in question Management approval, in addition to peer and quality review of designs, will be obtained prior to procurement, manufacture, construction, or field implementation Peer and quality reviews will be corroborated through authentication of the design reviews in accordance with the Site Engineering Process (1-V51-COEM-DES-210)</p> <p>During the fielding of each remediation project, management will evaluate the organization to determine the effectiveness of the QAPP and overall K-H organization performance Management assessments will be documented in formal QA reports and will be implemented in accordance with <i>K-H Management Assessment Program</i> (3-W24-MA-002) Independent assessments will be performed by personnel who are not directly responsible for the work being performed Independent assessments will be performed in accordance with <i>Site Integrated Oversight Manual</i> (MAN-013-SIOM)</p>
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Response to City of Broomfield Comments – Draft RSOP for Routine Soil Remediation

	Specific Comments	
1	<p>Page 10, Regulatory Oversight, 2 2 1, ¶ 1</p> <p>Change the last sentence to state The modification will be developed in consultation with the agencies and <i>local governments</i> and is subject to agency approval</p>	<p>The last sentence of paragraph 6 was changed to the following “Modifications will follow the RFCA process, which addresses regulatory agency approval and public involvement ”</p>
2	<p>Page 29, Regulatory Compliance, 4 2 1, 4<sup>th</sup> bullet</p> <p>The document states, “<i>ER staff will inform compliance staff when a unit has been closed</i> ” When the NPWL is closed in sections, who will be performing the visual inspection for the debris rule? If ER staff performs the inspection and makes the decision for the final waste disposition, define how this decision is integrated with the compliance staff duty</p>	<p>The visual inspection for the debris rule will be conducted by the project Waste Generator, who may be from ER or a compliance organization The Waste Generator will have the following training</p> <ul style="list-style-type: none"> <li>• Waste Generator,</li> <li>• Waste Management,</li> <li>• RCRA Waste Generator, and</li> <li>• RCRA Waste Management</li> </ul> <p>The last bullet was changed to the following “ER staff will document remediation activities in the Closeout Report Compliance staff will use this information to update the RCRA permit and the Master List of RCRA Units ”</p>
3	<p>Figure 6, Decision Framework for Soil Accelerated Actions</p> <p>See general section titled “Evaluate or Manage”</p>	<p>See response to General Comment No 6</p>
4	<p>Figure 7, Data Quality Objectives</p> <p>Broomfield would like clarification on the terms</p>	<p>RFCA Attachment 5, Sections 4 3 and 5 3, call for evaluation and/or management of areas with contaminant levels above Tier II ALs While the term is not quantitatively defined in RFCA, it</p>

	<p>“Evaluate or Manage the AOC as Necessary” and “Take Action” If these decisions are based on stewardship implications, clearly define the process in further detail within the document</p>	<p>applies to the stewardship and ALARA concepts including protection of surface water Figure Nos 6, 7, 12 (now 13), and 13 (now 14) have been changed to show that “evaluate or manage” lead directly to the stewardship and ALARA evaluations</p> <p>The result of “evaluate or manage” could include remediation, additional evaluation, monitoring, engineering controls, institutional controls, or a combination of actions</p>
5	<p>Figure 8, Stewardship and ALARA Process Overview</p> <p>Figure 8 and Figure 6 do not seem to reflect the same evaluation process Please clarify when and how ALARA will be considered in relation to stewardship decisions</p>	<p>Figures 6 and 8 (now 9) have been changed so that they are consistent Figure 6 has been revised to indicate that ALARA is considered regardless of the outcome of the stewardship evaluation</p> <p>Figure 8 (now 9) has been revised to indicate that an ALARA evaluation is conducted once before remediation begins and once after remediation has started An additional ALARA evaluation is conducted because new information may be found during remediation</p> <p>Additionally, the sequence of the ALARA and stewardship evaluations has been modified so that the final stewardship evaluation is conducted after the final ALARA evaluation This way, recommendations for institutional or engineering controls come after remediation is completed or stopped for ALARA considerations</p>



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6	<p>Page 49, Accelerated Actions, 5 2 1, ¶ 3</p> <p>If backfill is utilized that contains residual contamination, will this information also be located within the HRR?</p>	<p>Yes, see response to General Comment 3</p>
7	<p>Page 49, Accelerated Actions, 5 2 1, ¶ 4, 4<sup>th</sup> bullet</p> <p>Change the word <i>recommendations</i> to “<u>requirements</u>”</p>	<p>The ER RSOP stewardship evaluation will result in near-term requirements and long-term recommendations. This change was made throughout Section 5 2 1 (now Section 5 4 1)</p>
8	<p>Page 50-52, Accelerated Actions, 5 2 1 Surface Water Protection</p> <p>See comments in general section related to Surface Water Protection</p> <p>The document states the ALs for Radionuclide and non-Radionuclide ALs are protective of surface water. Additional measures will be required to obtain the RFCA standard after closure of the Site. Define when the evaluation to protect surface water is performed and how the decision is made and by whom</p>	<p>The evaluation to protect surface water is conducted during the stewardship evaluation in consultation with the regulatory agencies</p>
9	<p>Page 55, Accelerated Actions, 5 2 1, Institutional Controls</p> <p>Add “locks” to the 4th bullet</p> <p>Add “Information Management” (records) to this section</p>	<p>This section was deleted at the request of CDPHE</p>

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10	Page 55, Accelerated Actions, 5 2 1, Engineered Controls Add “holding ponds” to this section	The section was renamed Physical Controls and the text was changed to include holding ponds
11	Page 56, Accelerated Actions, 5 2 1, Resource Management If the Site does become a refuge, will Fish and Wildlife develop their own Management Plan? If Fish and Wildlife does not manage the contaminated areas, does the Site anticipate having two Vegetation Management Plans?	Yes, the U S Fish and Wildlife Service (Service) will develop their own Management Plan  It is anticipated that there would be a management plan for the refuge and one for the areas that DOE is responsible for (IA and the caps) It is also anticipated that these plans would be developed as part of the consultative process to ensure consistency with overall goals
12	Page 57, Accelerated Actions, 5 2 1, Plugging of Pipelines For pipelines left in place, define how material surrounding the pipes will be disposed of Will the material be compacted or mixed with additional material to prevent pathways for contaminated material?	OPWL that require a different remedy, other than excavation, will be covered under a different decision document Preferential pathways for groundwater flow that are not associated with IHSSs, PACs, or UBC Sites will also be disrupted as part of Site closure using BMPs This includes utility corridors
13	Page 57, Accelerated Actions, 5 2 1, Confirmation Sampling Broomfield realizes the IA SAP and the Buffer Zone SAP are not public comment documents, but the City has a concern the documents do not require Independent	It is the responsibility of the regulatory agencies to provide independent validation of sampling and analysis activities EPA has stated that they are currently developing a sampling and

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	Validation (IV) by a third party The City intends to continue discussing the options for having an IV performed after final remediation	analysis plan for conducting independent verification of sampling activities  Offsite laboratory analysis will be used for confirmation sampling analysis Methods are approved by EPA and data are validated according to Analytical Services Division requirements
14	Page 58, Accelerated Actions, 5 2 1, Remediation Decision  Add "Solar Ponds" and "Current Landfill" to this section for areas outside the scope of this document	This section was deleted at the request of CDPHE
15	Page 60, Accelerated Actions, 5 2 1, Potential Long-Term Stewardship Actions  Add "long-term operations and maintenance of treatment units"	This section was deleted at the request of CDPHE
16	Page 60, Accelerated Actions, 5 2 1, Institutional Controls  Add "Record-keeping/Information Management" to this section	This section was deleted at the request of CDPHE
17	Page 61, Accelerated Actions, 5 2 1, Long-Term Maintenance  Add the term "operations and maintenance" to the section	This section was deleted at the request of CDPHE

18	<p>Page 63, ALARA Evaluation, ¶ 2</p> <p>If the ALARA evaluation performed before and during remediation is not intended as an ALARA analysis of final remedial actions, clarify the differences between the two evaluations. Define the distinction between the ALARA evaluation and the ALARA analysis</p>	<p>The ALARA evaluation in the ER RSOP is intended for the accelerated actions performed under this RSOP. Other ALARA evaluations or analyses conducted for any other work control, remediation, or decision document may be different from the ER RSOP evaluation. It cannot be determined at this time what other ALARA evaluations or analyses may include</p>
19	<p>Page 63, ALARA Evaluation, Health and Safety Evaluation, ¶ 1</p> <p>The City has always voiced the importance of the health and safety of the workers. The document states, “Although work controls will be used to control hazards to workers, there may be instances when continued excavation will endanger the H&amp;S of the workers” Provide the City with a clarification of this statement and provide us with potential scenarios. Some of the statements refer to deep excavations or use of a trench box. With the use of heavy equipment, deep excavations can be tiered to meet OSHA requirements and ensure the safety of the workers. If there are options to alleviate the health and safety hazards, define the evaluation process to formulate the decision to stop or continue excavation and/or remediation</p>	<p>It is correct that almost any excavation can be tiered to meet OSHA requirements. However, the layback required for very deep excavations will be prohibitively expensive and may still not be protective. In general, Site excavations are restricted to 8 feet in depth. The Health and Safety Manager will evaluate each project to determine whether the excavation is safe. The Health and Safety Manager’s evaluation will include all health and safety parameters unique to each remediation, not only the depth of the excavation</p>
20	<p>Page 64, ALARA, Technical Feasibility Evaluation</p> <p>A major evaluation criteria to be considered for technical feasibility is if an area is beneath a deep basement that was not removed by decommissioning. Broomfield is</p>	<p>The text was changed to “Technical feasibility will depend on the specifics of the contamination, the work processes required to continue the remediation, area and weather-specific factors, and</p>

	<p>concerned this criteria would apply to several of the Type 3 or 2 facilities that may need further remediation to protect groundwater and surface water. In light of the newly proposed South Side Strategy for remediation, the second criteria of the technical feasibility evaluation addresses <i>Does remediation to ALARA require remediation of very large areas (over 1 acre)?</i> Further remediation would not be considered with the proposed South Side Strategy. Clarify what areas would be considered for further remediation if the major facilities will not be considered along with projects associated with the South Side Strategy.</p>	<p>other technical considerations appropriate for that work.”</p>
21	<p>Page 64, ALARA, Cost Evaluation</p> <p>Broomfield is still unclear how the cost evaluation will be performed. Define the process and what dollar figure will conclude the evaluation. At what point will the evaluation trigger further excavation to achieve ALARA or determine when remediation will stop and the remediation will be considered ALARA?</p>	<p>DOE Orders specify that ALARA cost evaluations should be qualitative rather than quantitative. Qualitative evaluation will be performed in consultation with the regulatory agencies.</p>
22	<p>Page 72, In-Process Analysis and Confirmation Sampling, ¶ 2</p> <p>Broomfield continues to have concerns with the lack of an independent third party performing validation sampling to ensure remediation goals have been achieved. The IASAP and Draft BZSAP were not open to public comment, yet</p>	<p>It is the responsibility of the regulatory agencies to provide independent validation of sampling and analysis activities. EPA has stated that they are currently developing a sampling and analysis plan for conducting independent verification of sampling.</p>

	Broomfield voiced its concerns that the characterization documents did not include validation by an independent third party. The City will continue to express this concern and hopefully resolve this issue.	activities Offsite laboratory analysis will be used for confirmation sampling analysis. Methods and laboratories are approved by EPA and data are validated according to Analytical Services Division requirements.
23	Page 75, RCRA Units Clarify how the concrete slab of Building 964 will be addressed. Is the area considered part of the Solar Pond closure?	The concrete slab of Building 964 will be part of the Solar Evaporation Pond closure.
24	Page 79-80, Closure Options, Clean Closure and Debris Rule Identify the group performing the inspection to document the absence of hazardous or mixed waste stains and/or residuals. Will ER perform the inspection or will the compliance organization perform the inspection? Identify the training criteria to determine if residual contamination is present or not present.	The project Waste Generator will perform the inspections. The project Waste Generator may be from ER or a compliance organization. Training criteria include the following Site training: <ul style="list-style-type: none"> <li>• Waste Generator,</li> <li>• Waste Management,</li> <li>• RCRA Waste Generator, and</li> <li>• RCRA Waste Management</li> </ul>
25	Page 80, 6.5.4 Original Process Waste Lines, Sanitary Sewer System, and Storm Drains There may be cases where soil contaminated above agreed-upon cleanup levels and associated pipelines will not be excavated but may require a different action. In	Remediation of contaminated soil and associated OPWL is covered under the ER RSOP if the remedy is excavation. If, for example, the remedy is to "stabilize in place," the remediation is

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Response to City of Broomfield Comments – Draft RSOP for Routine Soil Remediation

	<p>these cases, an ER RSOP modification or PAM will be developed Broomfield has been assured the routine activity for underground pipelines will be excavation and removal Clarify if this section is referring to a separate remediation activity or is allowing material above agreed-upon levels to remain in place Broomfield does not foresee allowing pipelines and associated material above agree-upon cleanup levels to remain in place creating an environmental pathway to degrade groundwater and surface water quality The City requests further discussion pertaining to this subject at the D&amp;D/ER meetings</p>	<p>not routine and would require different documentation In this case, a PAM or IM/RA will be developed The “different action” could also include a range of options that cannot be identified at this time A new figure (Figure 8) that clarifies this concept was developed</p>
26	<p>Page 96, Backfilling</p> <p>The Site has not provided the City with the information to ensure how the QA/QC will be performed on recycled concrete when it is used as backfill to prevent subsidence The City has previously requested this information to pass on to our Engineers for their review If the material is to be processed by crushing, where will the process be staged and how will dust be controlled?</p>	<p>The backfill requirements will be developed by the contractor performing the backfilling The backfill requirements will be developed based on the performance criteria of less than 1% subsidence Dust will be controlled through water sprays, long-term stockpiles may be treated with surfactant Staging areas will either be short-term or long-term, long-term areas will be consistent with the minimum requirements for stockpiling areas in the RSOP for Recycling Concrete</p>
27	<p>Page 97, Onsite Soil, 3rd bullet</p> <p>If material above Tier II and below Tier I is used as backfill, how will the placed material with residual contamination be traced to establish stewardship controls?</p>	<p>When soil is returned to a site, the residual contamination will be documented in the Closeout Report and HRR, and the data records will be marked in SWD</p>

28	<p>Page 99, Closeout Report, 7<sup>th</sup> bullet</p> <p>Change the sentence to state <u>Deviation from the ER RSOP and reasoning for the changes.</u></p>	<p>The text has been changed to the following</p> <p>“Deviations from the ER RSOP – Will include exceptions to the ER RSOP not covered in a modification and the reasons for the exceptions”</p>
29	<p>Page 119, Incidental Spills</p> <p>Post-incident spill response may become redundant With the best preventative maintenance, heavy equipment routinely has ruptured lines and other releases Requiring a briefing to improve readiness and response may not be appropriate</p>	<p>The Integrated Safety Management System used at RFETS includes “lessons learned” A discussion of lessons learned in the post-incident spill response may help workers to notice potential problems so they can be prevented</p>
30	<p>Page 121, Waste Storage Requirements, 10 2 1</p> <p>Add the criteria for friable asbestos to this section</p>	<p>The text was changed to include criteria for friable asbestos</p>
31	<p>Page 125, Quality Assurance 11 0</p> <p>Broomfield is disappointed to see such a critical document have a bulleted one-page discussion pertaining to Quality Assurance (QA) and no mention of Quality Control (QC) The ER RSOP states, “The ER Program QAPP will discuss in detail how these criteria will be implemented” Add a statement to identify the schedule for the proposed QAPP Clarify how QC and QA will be integrated and implemented to ensure compliance with the remediation</p>	<p>The ER Program QAPP incorporates the requirements of DOE Order 414 1A, <i>Quality Assurance</i>, and 10 CFR 830 120, <i>Quality Assurance Requirements</i> Both the DOE Order and the regulation contain the same 10 quality criteria, which prescribe the quality standards necessary to meet the requirements of the RFETS Closure Contract The QAPP describes how the ER Program will implement the 10 quality criteria</p>



	<p>activities Will remediation projects have Field Engineers to ensure QA/QC compliance? Revise the ER RSOP to identify the specificities of QA/QC information to be included in the Closeout Report</p>	<p>The QA/QC requirements associated with ER work processes are presented in the QAPP Specific requirements are described for sampling and analysis, radiological surveys, analytical chemistry and isotopics, and remedial activities All final designs, documents, quality records, and computerized data will undergo validation through peer review, commensurate with the scale, cost, specialty, and hazards of the item or activity in question Management approval, in addition to peer and quality review of designs, will be obtained prior to procurement, manufacture, construction, or field implementation Peer and quality reviews will be corroborated through authentication of the design reviews in accordance with the <i>Site Engineering Process</i> (1-V51-COEM-DES-210)</p> <p>During the fielding of each remediation project, management will evaluate the organization to determine the effectiveness of the QAPP and overall K-H organization performance Management assessments will be documented in formal QA reports and will be implemented in accordance with <i>K-H Management Assessment Program</i> (3-W24-MA-002) Independent assessments will be performed by personnel who are not directly responsible for the work being performed Independent assessments will be performed in accordance with <i>Site Integrated Oversight Manual</i> (MAN-013-SIOM)</p>
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	<b>City of Westminster Comments, October 2, 2001</b>	<b>Response</b>
1	<p><b>Page 2, item 3:</b> "Non-routine remediation actions are those that require special engineering design and/or regulatory agency approval Included in the non-routine definition is perhaps a portion of the Original Process Waste Lines (OPWL) "</p> <p><b>Page 115 Section 9.2,</b> Unexpected Debris "Unexpected debris will be encountered during remediation activities This can include drums, wood, metal, plastic, rubber, fiberglass, or other debris "</p> <p><u><b>Comment:</b></u></p> <p>Use of the word perhaps does not indicate that an actual decision tree has been developed to determine under what conditions the remediation of OPWL become non-routine The criteria should be listed in the ER RSOP</p> <p>If the Site encounters drums wouldn't this be considered non-routine? Some drums may contain RCRA or rad material or highly pyrophoric depleted uranium It would seem prudent that if drums were encountered then the ER work would then become non-routine Please provide justification for including drums as routine remediation</p>	<p>Remediation of contaminated soil and associated OPWL is covered under the ER RSOP if the remedy is excavation It, for example the remedy is to leave in place, or any other action, the remediation is not routine and would require different documentation In this case, a PAM or IM/RA will be developed The "different action" could also include a range of options that cannot be identified at this time A new figure (Figure 8) that clarifies this concept was developed</p> <p>Similar to the situation for the OPWL, finding drums or tanks is considered routine if the remediation for the drums and tanks is excavation If, at any time during remediation, excavation is not possible because a different remedy is needed, work will be stopped and a different decision document will be prepared (used)</p> <p>Protection of workers and the environment work controls require us to understand potential hazards and implement appropriate safety measures Unknowns require work stoppage and evaluation to ensure we can proceed safely</p> <p>Work controls for encountering debris and other items are described in Section 9 2 of the ER RSOP</p>
2	<p><b>Page 2, paragraph 3:</b> "The ER RSOP provides for the interim cleanup of soil and debris and that final cleanup levels and long-term monitoring requirements will be determined in the CAD/ROD " The document further</p>	

<p>states “it is anticipated that the Comprehensive Risk Assessment will show that no further action is required at sites covered under this RSOP ” There is also a sentence in this paragraph stating, “because these are accelerated actions, long-term stewardship activities cannot be fully addressed at this time ”</p> <p><b><u>Comment</u></b></p> <p>Although the Rocky Flats Cleanup Agreement speaks to an intermediate end state, the reality is that the Department of Energy and Kaiser-Hill will only have this one opportunity to cleanup soil and debris to a no further action state Therefore, the City recommends that all soil and debris be remediated so that no further cleanup action is required Both Senator Allard and Congressman Udall have cautioned the community that funding will likely dry up after 2006 There are other sites in the complex that are waiting for cleanup money to be freed up from the Rocky Flats closure The current state of world affairs also raises the risk that the closure budget will not be fully funded after 2002</p> <p>Long-term stewardship activities are not time consuming nor difficult to address The long-term stewardship document “Hand-in-Hand Stewardship and Cleanup,” March 2001, outlines the process for incorporation of stewardship in remedy selection and provides a stewardship toolbox that can be used by DOE and Kaiser-Hill The City is aware that routine remediation uses soil removal as the remedy However, required long-term</p>	<p>Soil will be remediated to the agreed-upon cleanup levels based on ALs, the stewardship evaluation, and the ALARA evaluation</p> <p>Because accelerated actions are not final actions under RFCA, they cannot be treated as final actions in the ER RSOP In accordance with RFCA, results of the Comprehensive Risk Assessment (CRA) may indicate that additional action is necessary DOE must take action if it is indicated in the CRA These final actions may include additional remediation, treatment, or Sitewide reconfiguration and cover</p>
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	<p>stewardship activities can still be captured for each remediation site Accelerated actions should not preclude using this LTS document</p>	<p>The stewardship evaluation in the ER RSOP is designed for individual accelerated actions and not stewardship for the entire Site The ER RSOP stewardship analysis may result in recommendations for interim monitoring, institutional, or physical controls Because the final remedy has not been decided, the final long-term stewardship requirements cannot be described The final stewardship requirements will consider all areas of the Site, including areas where accelerated actions were performed Additionally, the final stewardship requirements may well modify or eliminate many of the accelerated action stewardship actions because the long-term stewardship actions are more comprehensive Using current data and assumptions, DOE will qualitatively consider potential long-term stewardship actions when evaluating accelerated action stewardship options</p> <p>“Hand in Hand Stewardship and Cleanup” and the “toolbox” were evaluated to determine how they could be used in the ER RSOP While many of the concepts in this document were focused on remedy selection and long-term stewardship, the ER RSOP incorporates several of the suggested toolbox considerations including the following</p> <ul style="list-style-type: none"> <li>• Physical controls,</li> <li>• Institutional/administrative controls,</li> <li>• Monitoring/maintenance,</li> <li>• Information management, and</li> <li>• Periodic assessment</li> </ul>
3	<p><b>Page 3 Section 1.2 Regulatory Framework, third paragraph:</b> Westminster understands that Attachment 5 to RFCA, Action Levels and Standards Framework (ALF)</p>	

	<p>for Surface Water, Ground Water and Soils provides the rationale and numeric Als for surface soil</p> <p>The draft RSOP indicates that “Surface soil interim cleanup levels are equal to Tier I Als unless protection of surface water requires a greater level of cleanup Although final cleanup levels will be determined in the CAD/ROD, it is anticipated that the interim cleanup will meet the final cleanup requirements ”</p> <p><b><u>Comment</u></b></p> <p>The Kaiser-Hill closure contract requires Kaiser-Hill to meet the current cleanup levels in the RFCA Will the RFCA be amended at the end of the current RSAL review to reflect the new cleanup numbers and will Kaiser-Hill be required to meet those numbers during ER work? Also, this section discusses the fact that the surface soil interim cleanup levels are equal to Tier I Als unless protection of surface water requires a greater level of cleanup The document does not spell out the criteria for making the decision that further soil cleanup is required to protect surface water The ER RSOP should be spelled out and or list the criteria to be used Will the Environmental Protection Agency and the Colorado Department of Public Health and Environment be parties to this decision? Will the local governments be consulted?</p>	<p>K-H will remediate according to agreed-upon cleanup levels It is anticipated that if changes to RFCA ALs result in remediation beyond current RFCA ALs, K-H will be directed by DOE to remediate to new levels</p> <p>The surface water evaluation is provided in Section 5 4, Long-Term Stewardship</p> <p>The stewardship evaluation, including the evaluation of surface water impacts, will be in the Notification The Notification will be prepared in consultation with the regulatory agencies and the agencies will have approval authority of the Notification The local governments will be informed during regular meetings including the ER/D&amp;D Status Meeting and other forums as necessary</p>
4	<p><b>Page 4, ER RSOP Modifications:</b> “Modifications to the RSOP will be designated sequentially and will be placed in the Administrative Record and in the Appendix of the ER RSOP ” <b>Page 11</b> “Communication with stakeholders</p>	

	<p>is also facilitated by use of the Internet The ER Section of the Environmental Data Dynamic Information Exchange (EDDIE) will be updated with information related to ER RSOP Notifications Closeout Reports ”</p> <p><b><u>Comment:</u></b></p> <p>The City of Westminster requests that it be supplied with hard copies of all modifications to the RSOP as well as Closeout Reports It has been the City’s experience that upgrades to EDDIE are not always completed in a timely manner and that there is often a lag time of months before the information becomes available at the Site’s website</p>	<p>Modifications to the ER RSOP and all Closeout Reports will be supplied to the Cities</p>
5	<p><b>Page 4, Section 1.4 ER RSOP Notification “A</b></p> <p>notification will be prepared at the beginning of the fiscal year and as the need to remediate arises A map of potential remediation targets and contaminants of concern will be included in the notification ”</p> <p><b><u>Comment:</u></b></p> <p>Because of the U S war on terrorists, continued full funding for Rocky Flats Cleanup and Closure could be in jeopardy after 2002 The City suggests that DOE and Kaiser-Hill prioritize the areas to be remediated under the ER RSOP each year A contingency plan priority list should be developed with those areas that have the potential to impact surface and groundwater or result in continued resuspension of radionuclides (903 Pad and Lip Area receiving high priority) If funding is cut, then the highest priority areas will at least be identified and</p>	<p>Priorities based on risk for remaining ER sites cannot be practically implemented Because much of the remediation at RFETS is dependent on removal of buildings, ER remediation is scheduled around decommissioning activities The new RISS strategy is accelerating ER activities as much as possible</p>

	remediated	
6	<p><b>Page 7, Section 2.2.1, Planning</b> “The key planning decision documents supporting the accelerated actions are the Industrial Area Sampling and Analysis Plan, the Draft Buffer Zone Sampling and Analysis Plan and the ER RSOP ”</p> <p><u><b>Comment:</b></u></p> <p>The Integrated Monitoring Plan (IMP), will be used post-closure for long term monitoring. It does not contain a section on soil monitoring. A section needs to be developed in the IMP to address this media. Any surface or subsurface soil that is not cleaned up to background levels poses the potential for migration of contamination that can find its way into surface water from storm events and runoff</p>	<p>No soil monitoring will be performed under the IMP. Soil characterization is performed under the SAPs. Monitoring under the IMP includes media that has the potential to transport contaminants (i.e., groundwater, surface water, and air). This monitoring provides verification as to whether characterization and remediation were effective and continue to be effective</p>
7	<p><b>Page 10, Section 2.2.3, Closeout Remediation Approach</b> “The Closeout report will summarize characterization data, the action taken, demarcation of excavation, confirmation sampling results, remediation waste volume and disposition, any changes in the rationale behind the change, and the demarcation of residual contamination left in place ”</p> <p><u><b>Comment:</b></u></p> <p>The closeout report would be an excellent place to note</p>	<p>As stated in Section 6.13 Closeout Report, bullet 8, the Closeout Report will contain “Demarcation of Site Condition After</p>

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	<p>the activity level of the contamination left behind and the Institutional Controls that will be required as well as ongoing monitoring/post-closure monitoring required as a result of the decision to leave contamination in place</p> <p>Groundwater monitoring well locations as well as nearby plumes would also be important to note in this document</p>	<p>Remediation – Will include a map of residual contamination above background, method detection limits, and Tier II ALs, if any”</p> <p>Additionally, recommended stewardship actions are cited in bullet 10</p> <p>Routine groundwater monitoring well locations and groundwater plumes are described in the IMP reports and will not be included in soil remediation closeout reports</p>
8	<p><b>Page 18, Table 2, Potential Release Sites</b> The bottom of this page (OU8) indicates that there are radioactive Sites south and northeast of Building 779 The source of the contamination is listed as tracked contamination</p> <p><u><b>Comment:</b></u></p> <p>Please provide the City of Westminster with information as to the circumstances under which the radioactive contamination was tracked Is the contamination the result of the removal of Bldg 779?</p>	<p>This information is found in the HRR and Appendix C of the IASAP This contamination is not the result of the removal of Building 779</p>
9	<p><b>Page 31, fourth bullet:</b> “Some components of the storm drain system may be maintained or modified as part of long-term stewardship needs after Site closure</p> <p>Contaminated storm sewers will be removed Storm sewers deeper than 3 feet below grade will be foamed or grouted and abandoned in place” <b>Page 88, Storm Drains</b> “There are 239 storm drains at RFETS totaling approximately 79,500 feet in length Storm drains may have been exposed to contaminated liquids because of</p>	



	<p>spills, fires contaminated surface-water runoff, and contaminated sediments Silver paints have been documented in storm drains”</p> <p><b><u>Comment:</u></b></p> <p>What is the difference between a storm drain system and a storm sewer? Maintaining some components of the storm drain system after closure is new information to the City This statement raises questions as to where the flows from the system will be diverted into the Woman Creek/Walnut Creek drainages Storm drains at RFETS capture runoff contamination not only radionuclides but heavy metals The City of Westminster should be involved and part of any planning for retention of components of the storm drain system post closure</p> <p>The storm drain system or storm sewer provides a pathway for the movement of contamination through the channels that contain the pipes How does the Site propose to close off this contaminant pathway?</p>	<p>Storm drains and storm sewers are the same The text in Section 4 4 was changed to “Some components of the clean storm drain system may be maintained or modified as part of long-term stewardship needs after Site closure Contaminated storm drains will be removed Storm drains deeper than 3 feet below grade will be foamed or grouted and abandoned in place”</p> <p>As stated in Section 6 5, “pipelines will be grouted to eliminate potential contaminant migration pathways” Additionally, other potential pathways will be disrupted using BMPs</p>
<p>10</p>	<p><b>Figure 6, Decision Framework for Soil Accelerated</b></p> <p><b>Actions:</b> The flow chart indicates that a decision needs to be made if remediation is required based on DQO criteria The next step is to remediate if necessary The Site Water Balance, Actinide Migration Studies and Land Configuration Design Basis then are taken into consideration when determining whether the stewardship evaluation indicates additional remediation is necessary</p>	

	<p><u><b>Comment:</b></u></p> <p>Based on all the local government comments on remedy selection, long-term stewardship and remediation the City proposes the following changes to the flow chart</p> <ol style="list-style-type: none"> <li>1 <u>AME, SWWB LCDB</u> results be combined into one document to ensure that there is integration between these documents and remediation decisions</li> <li>2 The first step then is to <u>determine if remediation is required</u> If so then it is necessary to <u>determine the remedy</u> Soil excavation and removal has been chosen for all routine environmental remediation</li> <li>3 The next step is to <u>accomplish a stewardship analysis</u> What long term monitoring requirements are required as a result of the residual contamination? Would a better removal (ALARA analysis) reduce the need for monitoring and Institutional Controls? Perhaps an ALARA analysis should be considered at this point</li> <li>4 <u>Remediate</u></li> <li>5 Follow the rest of the flow chart <u>Capture information related to long-term stewardship institutional controls and monitoring in the closeout document</u> The closeout document would not address details of replacing controls or monitoring frequency, but would note that it is required</li> </ol>	<p>Information from these documents will be summarized in the RI/FS</p> <p>Because the ER RSOP only includes excavation as the remedy, it is not necessary to determine the remedy</p> <p>Figures 6 and 8 (now 9) – Stewardship and ALARA have been revised to be consistent Additionally, the sequence of the ALARA and stewardship evaluations has been modified so that the final stewardship evaluation is conducted after the final ALARA evaluation This way, recommendations for institutional or engineering controls come after remediation is completed or is stopped for ALARA considerations</p>
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11	<p><b>Page 34, Section 5.1.2, Subsurface Soil:</b> The last paragraph in this section indicates that “the final action for the site (described in final CAD/ROD) will provide for long-term protection of human health and environment, address remaining threats posed by the Site, and protect surface water resources ”</p> <p><u><b>Comment</b></u></p> <p>Please provide information to the City as to how the final CAD/ROD will provide for long-term protection of human health and environment This protection should be considered in the remedy selection and environmental remediation process Also, unclear is how the CAD/ROD will protect surface water resources Protecting surface water should be a factor in all decisions made in the field during ER activities</p>	<p>The CAD/ROD is the document that describes the final action for the Site Consequently, all remaining actions for the Site for the protection of human health and the environment will be in the CAD/ROD</p>
12	<p><b>Page 46 Section 5.2</b> “Many of the stewardship controls will be applied on a Site-wide basis and will not be affected by individual actions discussed in this RSOP DOE will consider additional remediation beyond Als in those cases where remediation would eliminate the need for specific institutional controls ”</p> <p><u><b>Comment</b></u></p> <p>This statement indicates that the Site believes that most of the Site will have the same stewardship controls Please</p>	<p>As stated in Section 5 2 2 (now 5 4 2) of the ER RSOP, long-term stewardship activities may consist of institutional controls</p>

	define controls as used in the above statement Are they access controls, use controls, institutional controls? It would seem prudent to address stewardship needs in each individual action and capture those needs in the closeout document Historical memory is easily lost and having this information already documented will facilitate preparation of the final CAD/ROD	including land use restrictions, long-term monitoring, and long-term maintenance Stewardship recommendations will be in the Closeout Report, summarized annually, and summarized in the RI/FS
13	<p><b>Figure 7, Data Quality Objectives</b> The flow chart indicates that the first step is to determine the nature and extent of Contaminants of Concern, the second step is to determine if the concentration is less than the detection limits, and the third step asks if the contaminant of concern is less than background plus 2 standard deviations</p> <p><u><b>Comment</b></u></p> <p>If the contaminant of concern is below the detection limits how will the site determine if the contaminants of concern concentration is less than background plus two standard deviations? What is the detection limit of each instrument to be used to determine contaminant levels for Rad's, VOCs, and metals? This information should be documented somewhere in the ER RSOP Will independent validation be conducted to ensure that the contamination has been removed at or below the detection limit? Who will provide the validation? Will laboratory analysis be used for confirmation sampling? If so, how will the delta between the sensitivity of lab methods versus instrument methods be accounted for? The ER</p>	<p>Organics are compared to detection limits because there is no Site background value for them Inorganic constituents (radionuclides and metals) are compared to Site background, and then to detection limits below background</p> <p>The detection limits are listed in Appendix E of the IASAP and BZSAP Additionally, this information was discussed at the October, 2001 ER/D&amp;D Status Meeting</p> <p>EPA has stated that they are currently developing a sampling and analysis plan for conducting independent verification of sampling activities</p> <p>Offsite laboratory analysis will be used for confirmation</p>

	<p>RSOP should also include a chart indicating the background numbers for each contaminant of concern and whether the numbers reflect a Colorado background number, Site background number Is the third box necessary if the second box is below detection limits?</p>	<p>sampling</p> <p>The sensitivity of offsite and onsite laboratory data will be evaluated in accordance with Appendix H of the IASAP and BZSAP</p> <p>The Site background values are listed in Appendix F of the IASAP and BZSAP</p> <p>As discussed above, the second box is for organics, and the third box is for inorganics</p>
14	<p><b>Page 46, Section 5.1.4, Data Quality Objectives, bullet 3</b> “When analytical results indicate a hot spot is present at 3 times the RFCA Tier 1 Action Level for surface soil or agreed-upon cleanup levels for subsurface soil, in accordance with elevated measurement comparison in the IASAP and BZSAP” action will be taken</p> <p><u><b>Comment</b></u></p> <p>Please provide information to the City as to why 3 times the action level is necessary before a hot spot is remediated How was this decision made and who were parties to the decision? Hot spots and their remediation should be addressed in the RSAL review that is currently being accomplished by the RFCA parties</p>	<p>The hot spot methodology was developed at the request of the regulatory agencies to ensure that RFETS would not try to overlook potential hot spots in areas outside IHSSs, PACs, and UBC Sites</p> <p>A hot spot may not need to be remediated because the risk from the hot spot is a function of the contaminant levels and exposure to a receptor Therefore, small hot spots that will have a limited exposure area can have higher contaminant concentrations because the receptor passes through the area quickly Larger hot spots must have lower contaminant concentrations because the receptor will take a longer time to pass through a larger area and</p>

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		<p>be exposed for a longer period of time</p> <p>The concept of three times the AL was negotiated between the regulatory agencies and the Site. This limit was proposed because CDPHE considered the “unlimited” values nonprotective if contaminants with acute toxicities were present. The three times the AL is consistent with the Residual Radioactivity Computer Code (RESRAD). The upper end of contaminant concentrations could be three times the average concentration with no deleterious chronic or acute effects even if the average concentration equals the AL.</p>
15	<p><b>Page 56, RFETS Stewardship Plan:</b> “DOE is developing the Stewardship Plan in consultation with the Stewardship Working Group.”</p> <p><u><b>Comment</b></u></p> <p>The City of Westminster Water Resources and Treatment Staff, City of Broomfield and the Woman Creek Reservoir Authority must be consulted before DOE finalizes any long-term stewardship plan. All three entities have separate issues that need to be addressed in the plan.</p>	<p>This comment will be forwarded to the Stewardship staff.</p>
16	<p><b>Page 61, Long-Term Maintenance:</b> “Long-term maintenance of caps, groundwater remediation systems and other remedial options may be necessary.”</p> <p><u><b>Comment</b></u></p> <p>Long-term maintenance, repairs and upgrades will be</p>	<p>This comment will be forwarded to the Stewardship staff.</p>

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	<p>necessary Although the DOE long-term stewardship plan is not a part of this document, it should include a statement addressing the need for replacement and or upgrading of cap covers, groundwater remediation systems and other remedial options that have mechanical/media components with newer, yet to be developed, advanced systems It is anticipated that most of the remediation systems will be in place for more than ten years and will eventually fail</p> <p>Criteria needs to be developed addressing indicators of a failing system and next steps</p>	
17	<p><b>Page 64, Cost Evaluation</b> “For the purpose of the ER RSOP, ALARA analysis, the cost considerations to achieve ALARA will include, type of waste, excavation and debris removal, waste sampling, waste packaging, waste transportation and disposal, backfill purchase and transportation, and backfilling compacting and revegetation ”</p> <p><b><u>Comment</u></b></p> <p>Costs of exceeding surface water standard at Indiana in Woman and Walnut Creek drainages (both monetary and public relation), as well as long-term stewardship monitoring costs, including man-hours to sample, cost of performing analysis should be factored into the ALARA analysis</p>	<p>Because long-term stewardship actions have not been identified, they cannot be included in the ALARA analysis</p>

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18	<p><b>Page 71, Section 6.3.1 Geostatistical Remediation Maps</b> “As part of data analysis, a geostatistical approach may be used to generate potential remediation targets ”</p> <p><u><b>Comment</b></u></p> <p>Location of fault lines at Rocky Flats need to be taken into consideration when determining potential remediation targets The fault lines serve as a preferential pathway for the movement of contamination</p>	<p>ER staff is aware of the location of potential faults at RFETS and will take these into account as necessary</p>
19	<p><b>Page 98, Section 6.11.3 Offsite Soil</b> “Offsite soil used for backfilling will be characterized to establish that it is comparable to RFETS background soil values Offsite soil will be staged onsite as necessary to ensure a consistent supply of backfill material ”</p> <p><b>Comment:</b></p> <p>What is the volume of soil that will be staged on site from offsite sources, where will it be stored, and what erosion controls will be in place to ensure the soil does not reach surface water? How long will the soil be stored onsite before it is used? The potential for resuspension of contamination as well as wind blown soils in 110 mph winds at RFETS should be addressed by providing cover or protection for any piles of dirt either awaiting analysis or future use</p>	<p>It is not possible at this time to determine how much offsite soil will be needed as backfill or how long it will be staged onsite Offsite soil will be “clean” and will not be staged in areas where it can easily erode into watersheds All soil stockpiles will be managed with BMPs</p>
20	<p><b>Page 135 Section 13.3 Water Quality and Quantity</b> “Water impacts evaluated in the Cumulative Impacts Document include altering flow rates or flow paths,</p>	

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<p>negative changes in floodplain capacities, and degradation of surface water quality or groundwater quality ”</p> <p><u>Comment</u></p> <p>Westminster requests that DOE and Kaiser-Hill make an effort to schedule remediation projects that would impact water quality/floodplain so as to minimize the additional effects that spring runoff, as well as early summer storm events would have on the drainages. Additionally, Westminster requests to be notified when ER actions will be taken in either Woman or Walnut Creek drainages</p>	<p>Remediation projects are currently scheduled to follow Decommissioning projects. If additional erosion mitigation measures are needed during different parts of the year, they will be implemented as BMPs. K-H and DOE are committed to preventing any adverse environmental impacts as a result of remediation activities</p>
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	<b>RFCLOG Comments, October 8, 2001</b>	<b>Response</b>
1	<p><b>Interim versus Final Actions</b></p> <p>The Coalition is concerned about the statement found in Section 1 0 suggesting that remedial actions under the ER RSOP are interim and not final While the Rocky Flats Cleanup Agreement (RFCA) provides for accelerated interim actions, the success of the closure project by 2006 requires that remedial actions are indeed final As discussed at the RFCA Stakeholder Focus Group and other forums, the RFCA parties agree on this important principle Therefore, we recommend amending Section 1 0 (page 2, paragraph 3) by adding a sentence along the lines of “all actions under the ER RSOP should be completed in a manner such that each remediation site meets the no further action requirements ”</p> <p>Furthermore, the presumption that accelerated actions are final actions necessitates integrating the various facets of cleanup, including remedy selection and stewardship considerations To suggest that the actions are interim and not final could serve to undermine this key principle That is one of the reasons why the Coalition has been pushing for a thorough stewardship analysis and why we are concerned about language in Section 1 0 which provides “because the RSOP addresses accelerated actions, long-term stewardship activities cannot be fully addressed at this time” We would argue that while the long-term stewardship activities cannot be “fully” addressed, than can and should be substantially addressed We discuss this argument further in the following section</p>	<p>Because accelerated actions are not final actions under RFCA, they cannot be treated as final actions in the ER RSOP In accordance with RFCA, results of the Comprehensive Risk Assessment (CRA) may indicate that additional action is necessary DOE must take action if it is indicated in the CRA These final actions may include additional remediation, treatment, or Sitewide reconfiguration and cover</p> <p>The following text was added to Section 1 0, page 2, paragraph 3 “The final cleanup levels and long-term monitoring requirements will be determined in the Corrective Action Decision/Record of Decision (CAD/ROD</p>

<p>2</p>	<p><b>Stewardship Evaluation</b></p> <p>Stewardship is of great importance to the Coalition and must be integrated with the remedy selection decisions in order to ensure the long-term protection and viability of selected remedies. We recognize and appreciate the incorporation of a stewardship analysis in the ER RSOP. Yet, as we have discussed with DOE and Kaiser-Hill staff, we remain concerned that the document does not comprehensively explain the basis and scope of future long-term stewardship analyses.</p> <p>DOE has noted at various meetings the crux of the stewardship analysis is not contained in the document. The Coalition is concerned that the Site is both purposely leaving this analysis open, as the details of the site-wide stewardship control are still unclear, and arguing that the ER RSOP shall serve as a model for long-term stewardship.</p> <p>Toward this end, while Section 5.2.1 provides an overview of potential controls that could be used to protect and enforce remedies, this section can and should be expanded. The Stewardship Working Group has done a considerable amount of work on this issue that we believe can serve to add specificity to the stewardship analysis. These issues have been raised in the working group's report entitled "Hand in Hand Stewardship and Cleanup" and in the "toolbox" that they have been developing, as well as at various other forums. Likewise, as raised at Stewardship Working Group meetings, we further suggest incorporating one of the issues that the</p> <p>The ER RSOP does not comprehensively explain the basis and scope of future long-term stewardship analyses because the long-term stewardship of the Site is outside the scope of the ER RSOP. This will be described in the Long-Term Stewardship Plan.</p> <p>The stewardship evaluation in the ER RSOP is designed for individual accelerated actions and not stewardship for the entire Site. The ER RSOP stewardship analysis may result in recommendations for interim monitoring, institutional, or engineering controls. Because the final remedy has not been decided, the final long-term stewardship requirements cannot be described. The final stewardship requirements will consider all areas of the Site including areas where accelerated actions were performed. Additionally, the final stewardship requirements may well modify or eliminate many of the accelerated action stewardship actions because the long-term stewardship actions are more comprehensive. Using current data and assumptions, DOE will qualitatively consider potential long-term stewardship actions when evaluating accelerated action stewardship options.</p> <p>"Hand in Hand Stewardship and Cleanup" and the "toolbox" were evaluated to determine how they could be used in the ER RSOP. While many of the concepts in this document were focused on remedy selection and long-term stewardship, the ER RSOP incorporates several of the suggested toolbox considerations including the following:</p> <ul style="list-style-type: none"> <li>• physical controls,</li> <li>• institutional/administrative controls,</li> <li>• monitoring/maintenance,</li> </ul>
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Response to Comments -- Draft RSOP for Routine Soil Remediation

	<p>National Research Council raised in its report to DOE on long-term stewardship, which is the need for duplicity to account for the risk of failure of stewardship controls</p> <p>Finally, lack of detail is also evident in several stewardship decision trees in the ER RSOP, such as Figure 8, where "consider additional remediation" is specified as an endpoint. This term is not defined in the document. Please provide further detail as to what "consider additional remediation" constitutes, and the process and basis for determining when an area will require additional remediation.</p> <p>As we have discussed at the Stewardship Working Group meetings, we appreciate your bringing these issues to the table and look forward to continuing to work with DOE on these issues. We request that the ER RSOP both address the above ideas and acknowledge that complete details of the long-term stewardship analysis will be determined at a later date and incorporated into future decisions.</p>
<ul style="list-style-type: none"> <li>• information management, and</li> <li>• periodic assessment</li> </ul> <p>The decision criteria used to determine if additional remediation should be considered are shown in Figure 8 (now 9) and described in Section 5.4.1 "Consider additional remediation" means that if there are potential stewardship impacts at accelerated action sites, DOE will consider remediation to below RFCA Tier I ALs. The extent of this remediation will depend on the nature and extent of contamination, location, existing monitoring locations, and other site-specific information. Consequently, the amount of remediation that will be considered for an individual IHSS will be determined on a case-by-case basis.</p> <p>This text was added to Section 5.2.1 (now 5.4.1) and Figure 9 was changed to reflect this concept.</p>	<p><b>3 Routine versus Non-routine Actions</b></p> <p>The Coalition understands the ER RSOP addresses routine remediation of soil and associated debris at the Site. One concern is the basis for determining what is routine and what is non-routine. We appreciate the extent to which Kaiser-Hill has addressed this issue at public meetings. Their attention to this matter has greatly clarified the basis for how the Site will make the determination, but we think the document could better address this analysis. Let us</p>

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<p>Section 10 contains language stating that remediation of a portion of the Original Process Waste Lines (OPWL) may be considered non-routine, but as stated in a subsequent paragraph, OPWLs could also be remediated under the ER RSOP as a routine action. Subsequently, Section 6.5 indicates that soil and associated OPWLs that are contaminated above agreed upon cleanup levels may not be excavated but may require a "different action". Because routine actions cover only excavation in the ER RSOP, we presume these other actions are considered non-routine. Is this assumption correct? Please specify the criteria used to determine whether remediation of the OPWLs is routine or non-routine, and when a "different action" may be required.</p> <p>Similarly, as clearly stated in the document, soil removal at some areas of the Site is a routine action. As noted in Section 5.2.1 (page 55), however, the use of an engineered barrier such as a cap or diversion ditch that is paired with a removal action would be considered under a separate decision document. Our understanding is the cleanup decisions are then going to be split and elements will be considered in different documents. What is the technical or planning basis for splitting a cleanup decision into two separate decision documents? We have raised this issue in the past but the concern remains that if a control is considered separately from the remedy analysis, the multiple facets of cleanup are not integrated.</p> <p>Additionally, Section 5.2 states that if a given area has the</p>	<p>cite a few examples</p> <p>The assumption regarding routine versus nonroutine actions for the OPWL is correct. Remediation of contaminated soil and associated OPWL is covered under the ER RSOP if the remedy is excavation. If, for example the remedy is to "leave in place", the remediation is not routine and would require different documentation. In this case, a PAM or IM/IRA will be developed. The "different action" could also include a range of options that cannot be identified at this time. A new figure (Figure 8) that clarifies this concept was developed.</p> <p>Similar to the situation for the OPWL, the use of an engineered cap or other engineered structure as part of stewardship recommendations after remediation under this RSOP would require additional documentation. The remediation is conducted under the RSOP and the stewardship activities are conducted according to a different decision document. The reason that there will be two documents is because the ER RSOP only covers excavation.</p> <p>If DOE were confident, before remediation started, that remediation would require more than excavation (for example, excavation plus a diversion ditch) a PAM or IM/IRA would be developed instead of invoking the RSOP.</p>
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<p>potential to affect water quality and is remediated to agreed-upon cleanup levels, it will be backfilled, stabilized, and revegetated. Since the ER RSOP addresses routine actions, it may be surmised that this procedure is considered routine. Protecting water quality by stabilizing and revegetating other areas such as the 903 Pad lip and americium zone, however, is considered non-routine. How is the determination made whether an action is routine or non-routine if it could be either?</p> <p>Lastly, the ER RSOP indicates characterized tanks (Section 6 8) and drums (Section 1 0) will be remediated under the ER RSOP as routine actions. In Section 6 9, the document states that “[previously unidentified]” areas requiring remediation that are identified during ER characterization or remediation will result in extension of the AOC [Area of Concern] and will not require a additional paperwork.” Will an AOC extension cover tanks and/or drums discovered during characterization or do they fall under a separate decision document as non-routine?</p> <p>While we believe this draft does a solid job of defining routine versus non-routine, the document should go one step further and clarify the types of issues discussed above</p>	<p>All excavations that are the result of excavation in accordance with this RSOP will be backfilled and revegetated. This is a routine action after excavation.</p> <p>The 903 Lip and Americium Zone is not considered a routine remediation because DOE is considering additional engineering designs to augment the excavation.</p> <p>The determination whether an action is routine or nonroutine is shown in a new figure (Figure 8).</p> <p>Section 6 9 refers to two types of unanticipated contamination (1) areas outside of current IHSS, PAC, or UBC Site boundaries that are found during ER characterization or remediation activities, and (2) potential areas of concern that are identified during other Site activities such as construction.</p> <p>In the first case, the boundaries of the AOC are expanded to encompass the additional contaminated area. Because one of the purposes of IHSS/PAC designations is to document the potential contaminant release site for future action, it serves no useful purpose to designate a site found during characterization or remediation of an existing IHSS or PAC as a new IHSS/PAC.</p> <p>In the second case, finding a new potential area of concern through a different Site activity would invoke the RFCA process of identifying a new PAC. Because the area of concern will need to be characterized at a future time according to the BZSAP or IASAP and perhaps remediated according to the ER RSOP, it will need a new number for tracking these activities to closure. The new PAC will be identified in the HRR.</p>
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4	<p><b>Use of “Evaluate or Manage” in Decision Trees</b></p> <p>In Figures 6, 7, 12, and 13, the term “Evaluate or Manage” is used as the endpoint to several questions regarding soil contaminant levels and remediation. The Coalition has asked Kaiser-Hill for clarification of this term but there is lingering confusion on our part. Please define the term “Evaluate or Manage” and incorporate the definition and process for making this determination into the document</p>	<p>RFCA Attachment 5, Sections 4 3 and 5 3, call for evaluation and/or management of areas with contaminant levels above Tier II ALs. While the term is not quantitatively defined in RFCA it goes to the stewardship and ALARA concepts including protection of surface water. Figure Nos 6, 7, 12 (now 13), and 13 (now 14) have been changed to show that “evaluate or manage” lead directly to the stewardship and ALARA evaluations</p> <p>The result of “evaluate or manage” could include remediation, additional evaluation, monitoring, engineering controls, institutional controls, or a combination of actions</p>
5	<p><b>Relationship between ALARA and Stewardship</b></p> <p>We understand the relationship between ALARA and stewardship when making remedial decisions is still being refined. Nevertheless, some apparent discrepancies regarding this relationship emerge in the ER RSOP. In Figure 6, it appears that ALARA is only considered if the stewardship analysis demonstrates additional remediation should be considered. If the stewardship analysis suggests additional remediation should not be considered, ALARA is bypassed. In Figure 8, however an ALARA analysis both precedes and follows the stewardship analysis. Please clarify the relationship between ALARA and stewardship</p>	<p>Figures 6 and 8 (now 9) have been changed so that they are consistent. Figure 6 has been revised to indicate that ALARA is considered regardless of the outcome of the stewardship evaluation</p> <p>Figure 8 (now 9) has been revised to indicate that an ALARA evaluation is conducted once before remediation begins and once after remediation has started. An additional ALARA evaluation is conducted because new information may be found during remediation</p> <p>Additionally, the sequence of the ALARA and stewardship evaluations has been modified so that the final stewardship evaluation is conducted after the final ALARA evaluation. This way, recommendations for institutional or engineering controls come after remediation is completed or remediation is stopped for ALARA considerations</p>

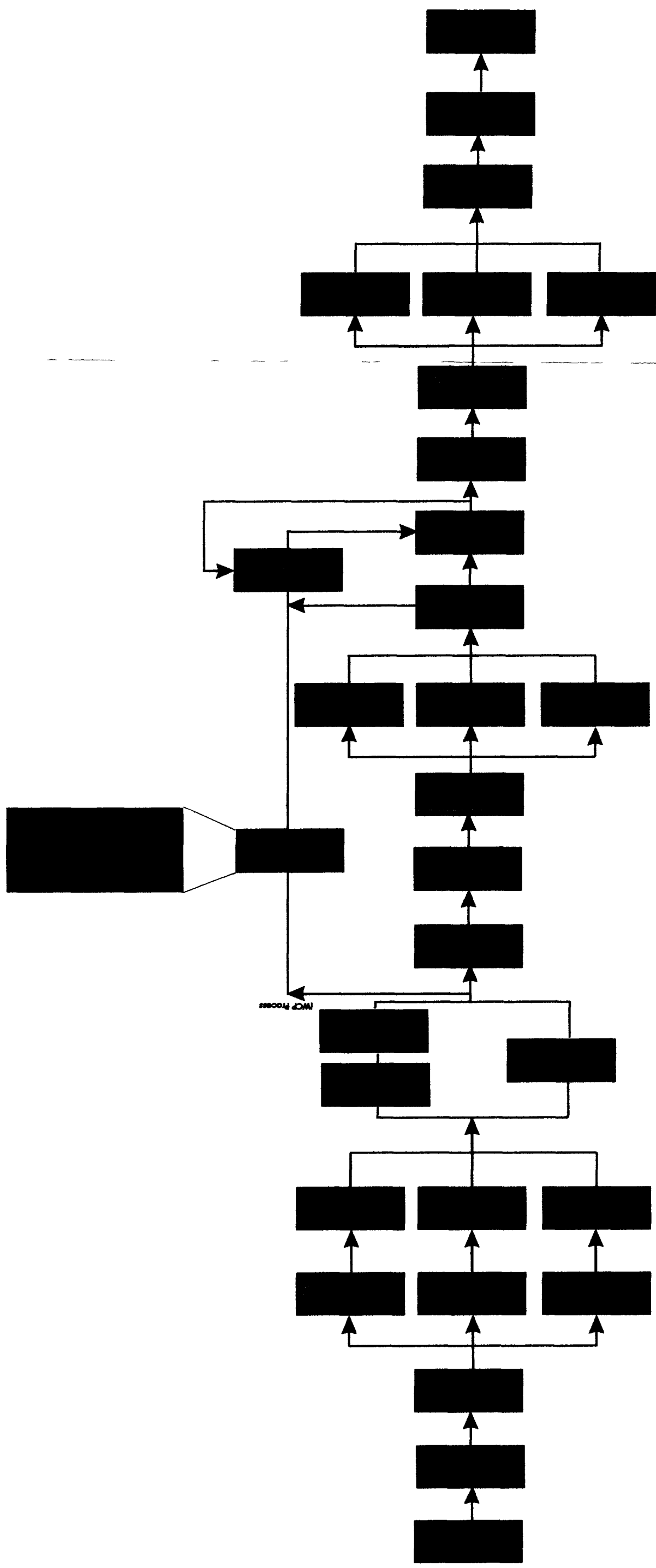
6	<div data-bbox="265 1485 297 1830" data-label="Section-Header"> <p><b>Additional Clarifications</b></p> </div> <div data-bbox="327 1081 867 1830" data-label="Text"> <p>The remedial action objective for surface soil is to prevent exposure to contaminated surface soils exceeding Tier I action levels. We know the DOE, EPA, and CDPHE are currently reevaluating the radionuclide soil action levels (RSAL) specified in the RFCA. Among the issues under review are the future use scenario and the use of a tier system to define the clean-up level. My understanding is that when the RSALs are finalized, this document and others will be adjusted to reflect that change. Is this assumption correct? Will this change constitute a major or minor modification to the document? The Coalition believes it is very important for local governments to be informed of major modifications to the ER RSOP and requests that the document indicate we are to be notified of any such modifications.</p> </div> <div data-bbox="897 1081 1186 1830" data-label="Text"> <p>Another issue for clarification involves staging piles. We understand concrete and excavated soil meeting the specified criteria could be used as backfill and stored in staging piles until such time as it is needed, as outlined in Section 6.11. We seek clarification as to how the Site will implement identified ARARs to protect water and air quality from the potential spread of further contamination due to erosion of the staging piles.</p> </div> <div data-bbox="1215 1081 1390 1830" data-label="Text"> <p>Finally, the ER RSOP, Actinide Migration Evaluation, Site-Wide Water Balance, and Land Configuration Design Basis Study will all likely influence the end-state of Rocky Flats. We would like a better explanation of how these studies and documents will be integrated and how</p> </div> <div data-bbox="335 219 550 1053" data-label="Text"> <p>The ER RSOP is AL neutral and can be used regardless of the numeric value of the AL. If the Tier I and Tier II structure remains, no changes are required. If the Tier structure changes some wording changes will be made. Wording changes to implement a new Tier structure are considered minor modifications.</p> </div> <div data-bbox="589 219 821 1053" data-label="Text"> <p>Stakeholders will be notified of ER RSOP modifications in accordance with Section 2.3 and RFCA Attachment 3, Section 3.10. It is anticipated that Stakeholders will be notified through the monthly ER/D&amp;D status meeting and other regular or special forums as needed. The text in Section 2.3 has been changed to read “</p> </div> <div data-bbox="844 380 1027 1053" data-label="List-Group"> <ul style="list-style-type: none"> <li>• RSOP Notifications,</li> <li>• RSOP Modifications,</li> <li>• Characterization and remediation schedules, ”</li> </ul> </div> <div data-bbox="1067 219 1245 1053" data-label="Text"> <p>The text in Section 6.11.2 was modified to read “Excavated soil may be staged on and covered with plastic tarps to prevent air dispersion pending use as backfill. Additionally, BMPs will be used to prevent the potential spread of contamination.”</p> </div> <div data-bbox="1285 219 1390 1053" data-label="Text"> <p>The results of the AME, SWWB, and LCDB will be used during the planning process to help determine RAOs and during the stewardship evaluation. Results of the AME are considered</p> </div>
---	--



Response to Comments – Draft RSOP for Routine Soil Remediation

	new technologies, as applicable, will be used to meet end-state objectives	during evaluation of erosion patterns and groundwater transport of actinides Results of the SWWB are considered during evaluation of potential groundwater pathways to surface water Results of the LCDB will be considered during evaluation of excavation and backfill parameters
--	--	---

262/262



**Figure 1**  
**Overall Accelerated Action Process**

## CHARACTERIZATION

## REMEDICATION

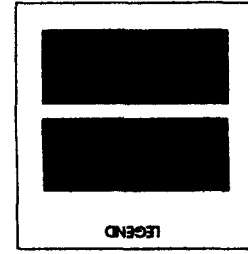


Figure 2  
Rocky Flats Environmental  
Technology Site

EXPLANATION

N Industrial Area Boundary

N Buffer Zone Boundary

Standard Map Features

Buildings and other structures

Lakes and ponds

Streams, ditches or other drainage features

Fences and the barriers

Paved roads

Dirt roads

DATA SOURCE BASE FEATURES.

Buildings, fences, hydrography, roads and other structures from 1993 aerial fly-over data acquired by EG&G RSL, Las Vegas. Digitized from the orthophotograph, 1995. Data Source: National Area Boundary data. Approved by NEI Dames (RMS: 505-956-4525).



Scale 1:21,430  
1 inch represents approximately 1,786 feet

0 900 2,000

State Plane Colorado Central Zone  
Datum NAD27

U.S. Department of Energy  
Rocky Flats Environmental Technology Site

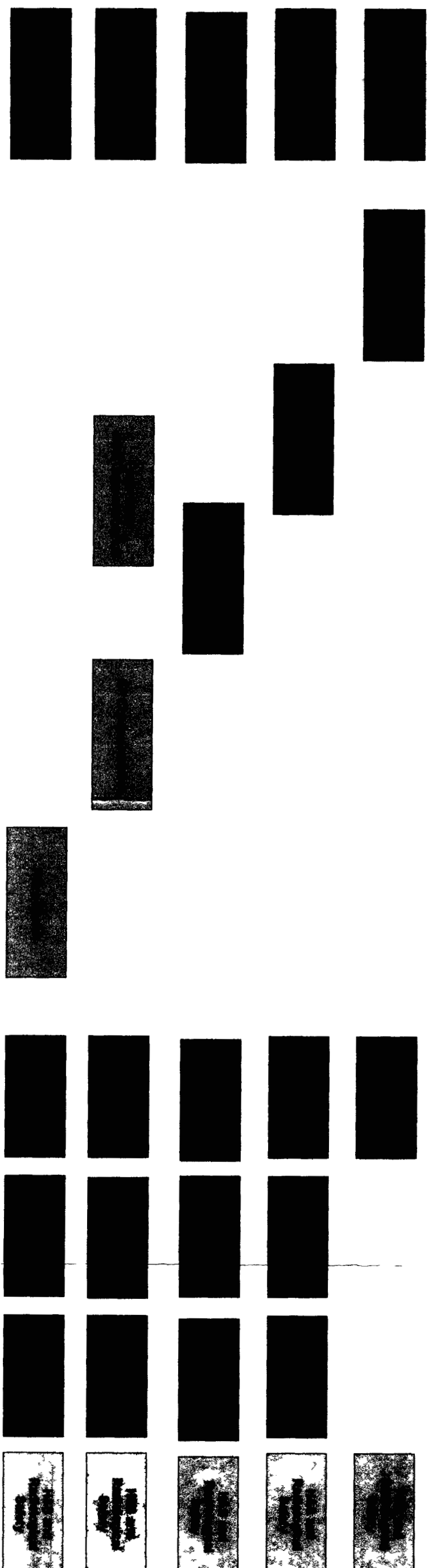
Prepared by  
**DynCorp**



MAP ID 2K-03364a, site 1192, enl

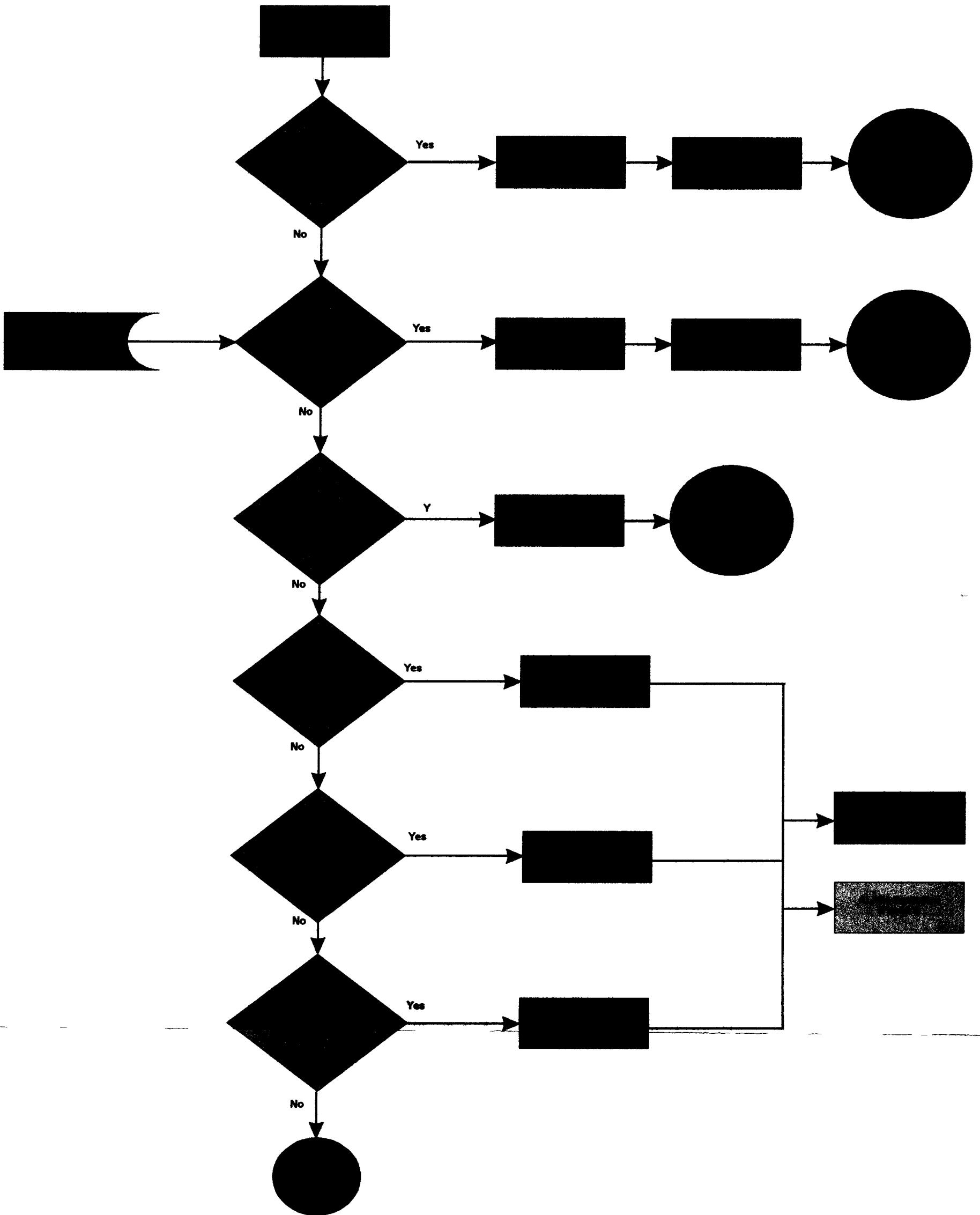
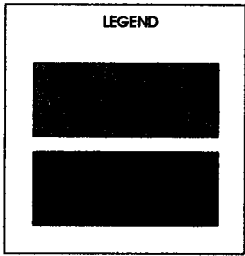
May 22, 2001

**Figure 5**  
**Key Project Interfaces**

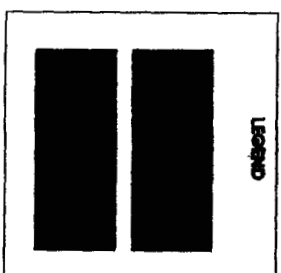


```
graph TD
    Start([Start]) --> Read[Read record]
    Read --> IsNew{Is new record?}
    IsNew -- Yes --> Add[Add record]
    Add --> End1([End])
    IsNew -- No --> IsUpdated{Is record updated?}
    IsUpdated -- Yes --> Add
    IsUpdated -- No --> IsDeleted{Is record deleted?}
    IsDeleted -- Yes --> End1
    IsDeleted -- No --> End2([End])
```

Figure 7  
Data Quality Objectives



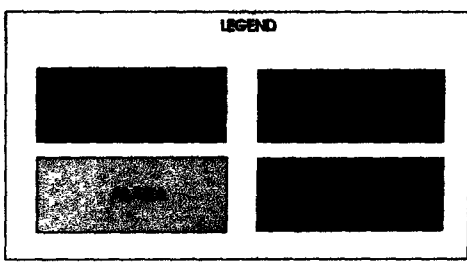
## LEGEND



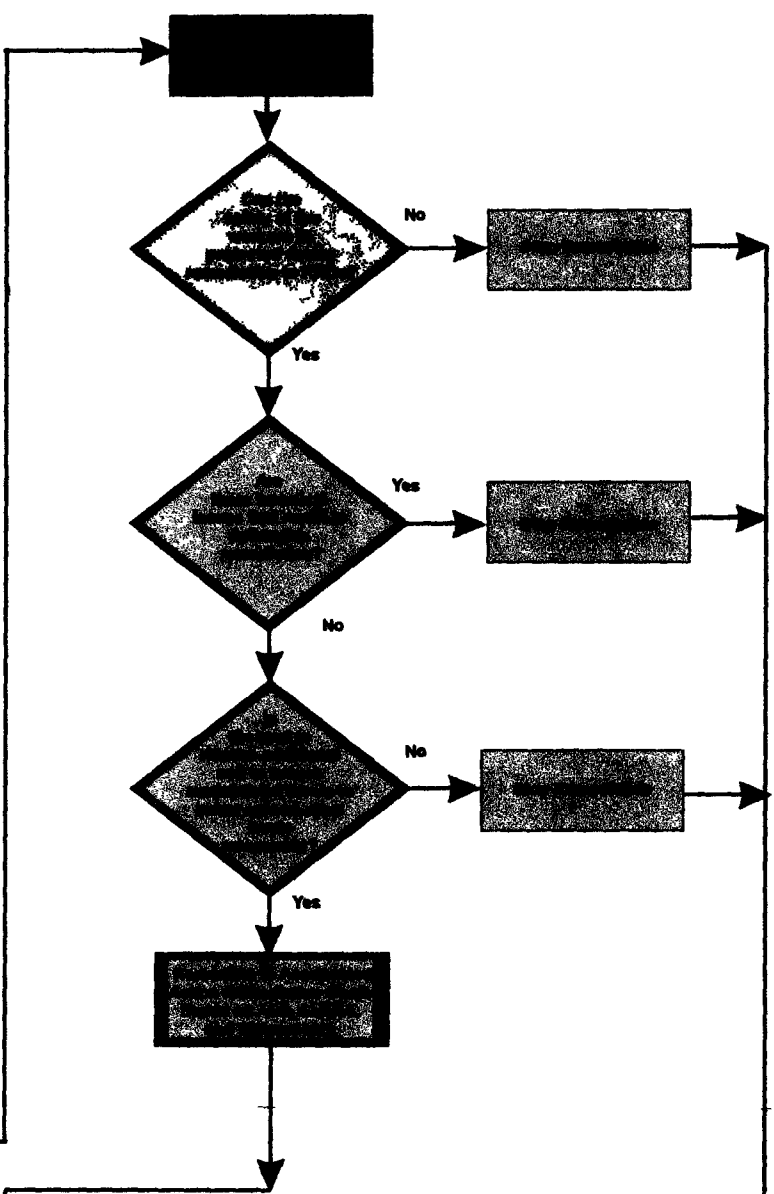
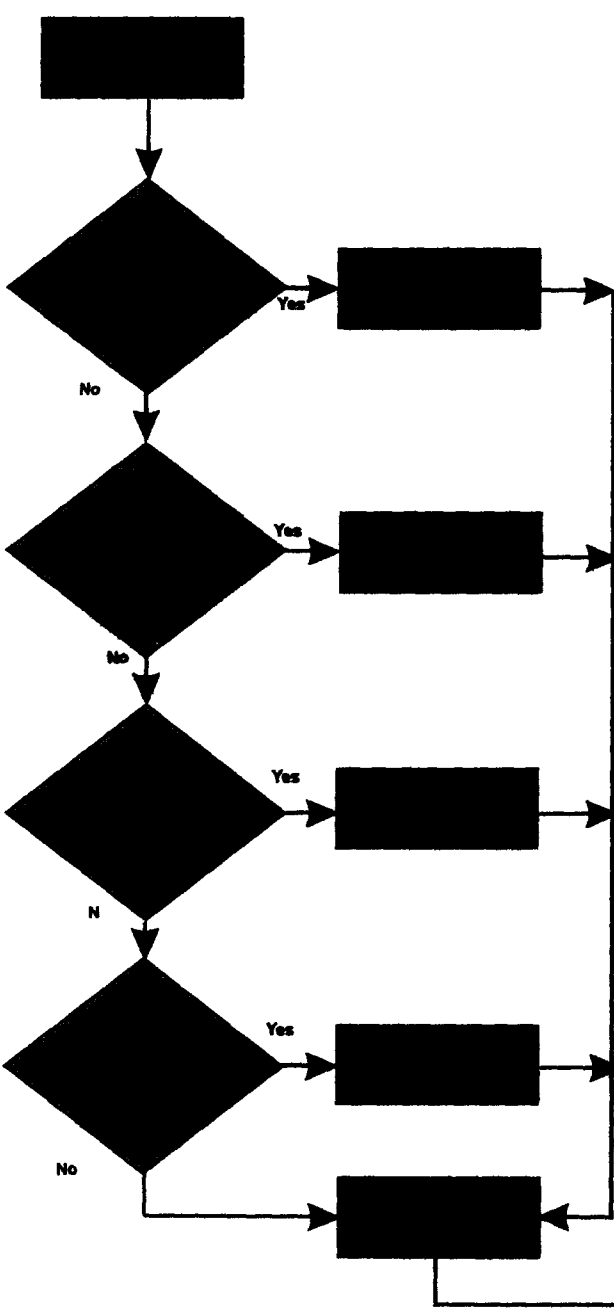
65

46

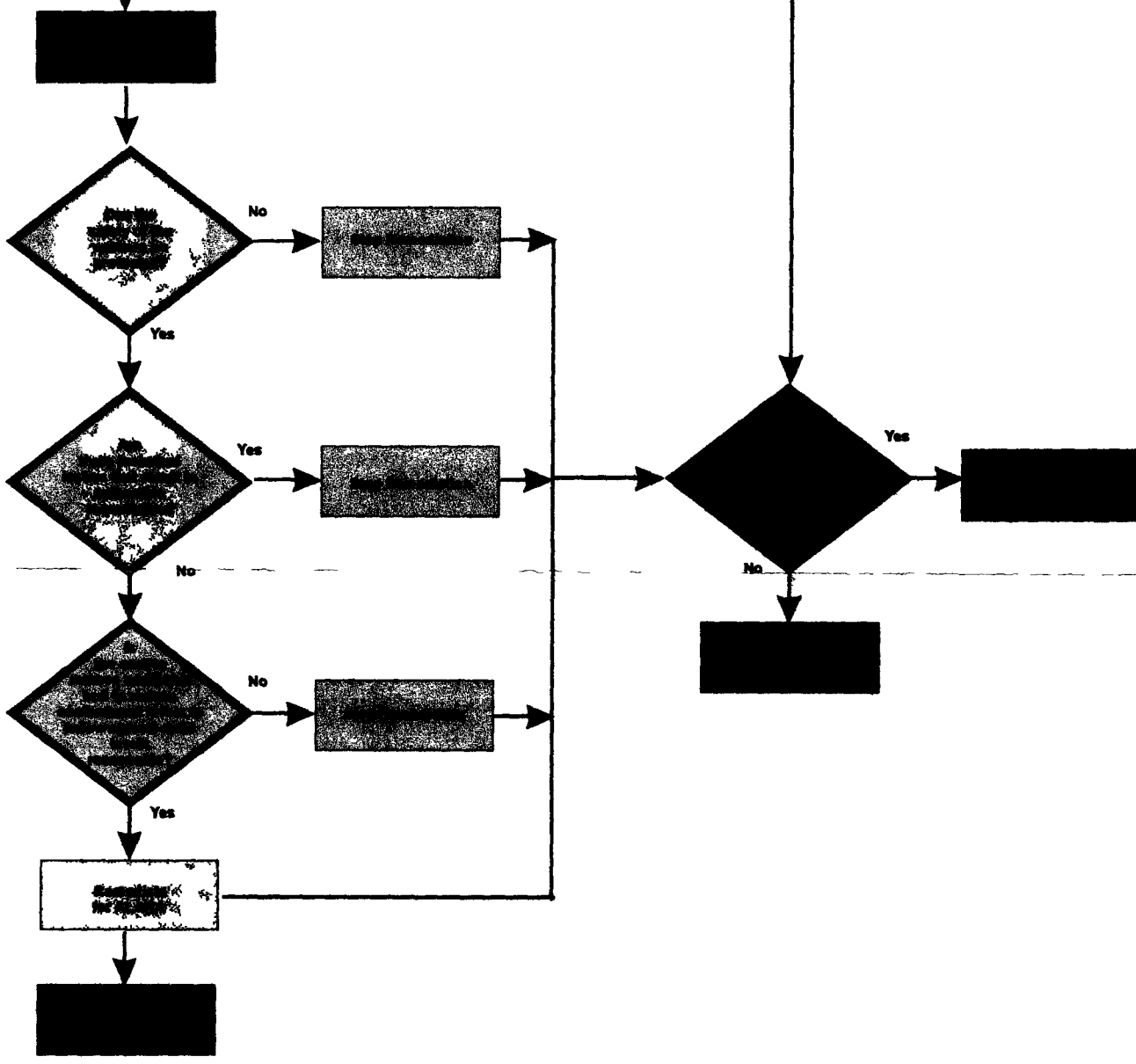
Figure 9  
Stewardship and ALARA Process Overview



Planning Process



Field Process





**Figure 10**  
**Surface Water**  
**Monitoring Locations**  
**for Fiscal Year 2001**

**EXPLANATION**

- ▲ Precipitation Gauge
  - Monitoring Location Objective
  - Buffer Zone Hydrology
  - New Source Detection
  - ▲ Point of Compliance
  - ▲ Point of Evaluation
  - Source Location
  - ▲ Ad Hoc
  - Performance
  - IDLH
- Standard Map Feature**
- Building and other structure
  - ▨ Solid Evaporative Pond (SEP)
  - Lake and pond
  - Stream, ditch, or other drainage feature
  - Fence and other boundary
  - Topographic Contour (20-Foot)
  - Rocky Flat boundary
  - Paved road

**DATA SOURCE RELIABILITY**  
 Accuracy, precision, and other characteristics of data sources are indicated by the following symbols:  
 Data obtained from the following sources are considered reliable:  
 1. Direct measurements from the following sources:  
 (a) Direct measurements from the following sources:  
 (b) Direct measurements from the following sources:  
 (c) Direct measurements from the following sources:  
 (d) Direct measurements from the following sources:  
 (e) Direct measurements from the following sources:  
 (f) Direct measurements from the following sources:  
 (g) Direct measurements from the following sources:  
 (h) Direct measurements from the following sources:  
 (i) Direct measurements from the following sources:  
 (j) Direct measurements from the following sources:  
 (k) Direct measurements from the following sources:  
 (l) Direct measurements from the following sources:  
 (m) Direct measurements from the following sources:  
 (n) Direct measurements from the following sources:  
 (o) Direct measurements from the following sources:  
 (p) Direct measurements from the following sources:  
 (q) Direct measurements from the following sources:  
 (r) Direct measurements from the following sources:  
 (s) Direct measurements from the following sources:  
 (t) Direct measurements from the following sources:  
 (u) Direct measurements from the following sources:  
 (v) Direct measurements from the following sources:  
 (w) Direct measurements from the following sources:  
 (x) Direct measurements from the following sources:  
 (y) Direct measurements from the following sources:  
 (z) Direct measurements from the following sources:

**NOTE**  
 The monitoring objectives performed at each location are described in the following table:  
 (a) Monitoring Objective: Health and safety of the community.  
 (b) Monitoring Objective: Health and safety of the community.  
 (c) Monitoring Objective: Health and safety of the community.  
 (d) Monitoring Objective: Health and safety of the community.  
 (e) Monitoring Objective: Health and safety of the community.  
 (f) Monitoring Objective: Health and safety of the community.  
 (g) Monitoring Objective: Health and safety of the community.  
 (h) Monitoring Objective: Health and safety of the community.  
 (i) Monitoring Objective: Health and safety of the community.  
 (j) Monitoring Objective: Health and safety of the community.  
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 (l) Monitoring Objective: Health and safety of the community.  
 (m) Monitoring Objective: Health and safety of the community.  
 (n) Monitoring Objective: Health and safety of the community.  
 (o) Monitoring Objective: Health and safety of the community.  
 (p) Monitoring Objective: Health and safety of the community.  
 (q) Monitoring Objective: Health and safety of the community.  
 (r) Monitoring Objective: Health and safety of the community.  
 (s) Monitoring Objective: Health and safety of the community.  
 (t) Monitoring Objective: Health and safety of the community.  
 (u) Monitoring Objective: Health and safety of the community.  
 (v) Monitoring Objective: Health and safety of the community.  
 (w) Monitoring Objective: Health and safety of the community.  
 (x) Monitoring Objective: Health and safety of the community.  
 (y) Monitoring Objective: Health and safety of the community.  
 (z) Monitoring Objective: Health and safety of the community.



Scale: 1 inch = 250 feet  
 1:25,000  
 U.S. Geological Survey  
 Open-File Report 98-10  
 Data from the following sources:  
 (a) Data from the following sources:  
 (b) Data from the following sources:  
 (c) Data from the following sources:  
 (d) Data from the following sources:  
 (e) Data from the following sources:  
 (f) Data from the following sources:  
 (g) Data from the following sources:  
 (h) Data from the following sources:  
 (i) Data from the following sources:  
 (j) Data from the following sources:  
 (k) Data from the following sources:  
 (l) Data from the following sources:  
 (m) Data from the following sources:  
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 (r) Data from the following sources:  
 (s) Data from the following sources:  
 (t) Data from the following sources:  
 (u) Data from the following sources:  
 (v) Data from the following sources:  
 (w) Data from the following sources:  
 (x) Data from the following sources:  
 (y) Data from the following sources:  
 (z) Data from the following sources:

U.S. Department of Energy  
 Rocky Flats Environmental Technology Site  
 Dept. 800-806-770

**DynCorp**  
 KAISER HILL

**Figure 11**  
**100 Year Average Erosion Map**

**EXPLANATION**

- 0.000 kg/m<sup>2</sup> @ 7 Lbs/yd<sup>2</sup> Deposition
- 0.200 kg/m<sup>2</sup> @ 368 Lbs/yd<sup>2</sup> Deposition
- 0.20 kg/m<sup>2</sup> @ 0.03 Lbs/yd<sup>2</sup> Deposition
- No Deposition or Detachment
- 0 kg/m<sup>2</sup> 1 Lbs/yd<sup>2</sup> Detachment
- 0.2 kg/m<sup>2</sup> @ 0.045 Lbs/yd<sup>2</sup> Detachment
- 0.050 kg/m<sup>2</sup> @ 0.08 Lbs/yd<sup>2</sup> Detachment
- 0.100 kg/m<sup>2</sup> @ 0.16 Lbs/yd<sup>2</sup> Detachment
- 0.150 kg/m<sup>2</sup> @ 0.76 Lbs/yd<sup>2</sup> Detachment
- 0.200 kg/m<sup>2</sup> @ 368 Lbs/yd<sup>2</sup> Detachment
- 0.250 kg/m<sup>2</sup> @ 46 Lbs/yd<sup>2</sup> Detachment
- 0.300 kg/m<sup>2</sup> @ 553 Lbs/yd<sup>2</sup> Detachment
- 0.350 kg/m<sup>2</sup> @ 645 Lbs/yd<sup>2</sup> Detachment
- Road Detachment

- Hilltop
- South Invasives Ditch (SID)
- Woman Creek
- Water two

**Standard Map Features**

- Buildings and other structures
- Sole Evaporator Pond (SEP)
- Lakes and ponds
- Streams ditches or the drainage features
- Fences and the barriers
- Topographic Contour (20-Foot)
- Paved roads
- D1 roads

NOTE: EROSION RATES FOR THIS MAP WERE DETERMINED BY THE U.S. ARMY CORPS OF ENGINEERS, WASH. DC. (1978) USING THE RUSKIN EROSION RATE ESTIMATION METHOD. THE RATES WERE DETERMINED FOR A 100 YEAR AVERAGE EROSION RATE. THE RATES WERE DETERMINED FOR A 100 YEAR AVERAGE EROSION RATE. THE RATES WERE DETERMINED FOR A 100 YEAR AVERAGE EROSION RATE.



Scale: 1 inch = 200 feet  
 0 200 400 feet

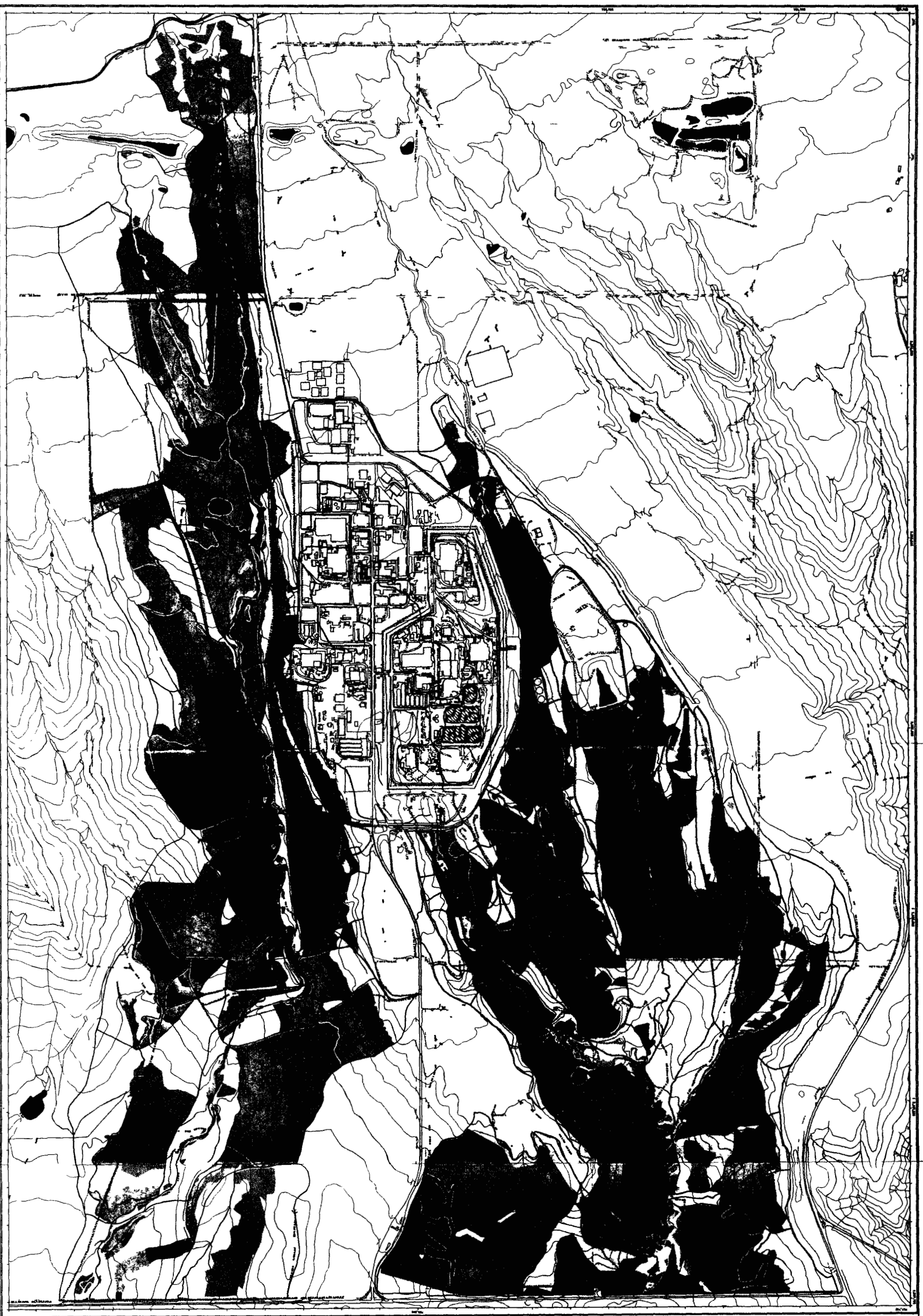
Map 1: 100 Year Average Erosion Map

Department: Energy  
 Facility: Fossil Environmental, including SR

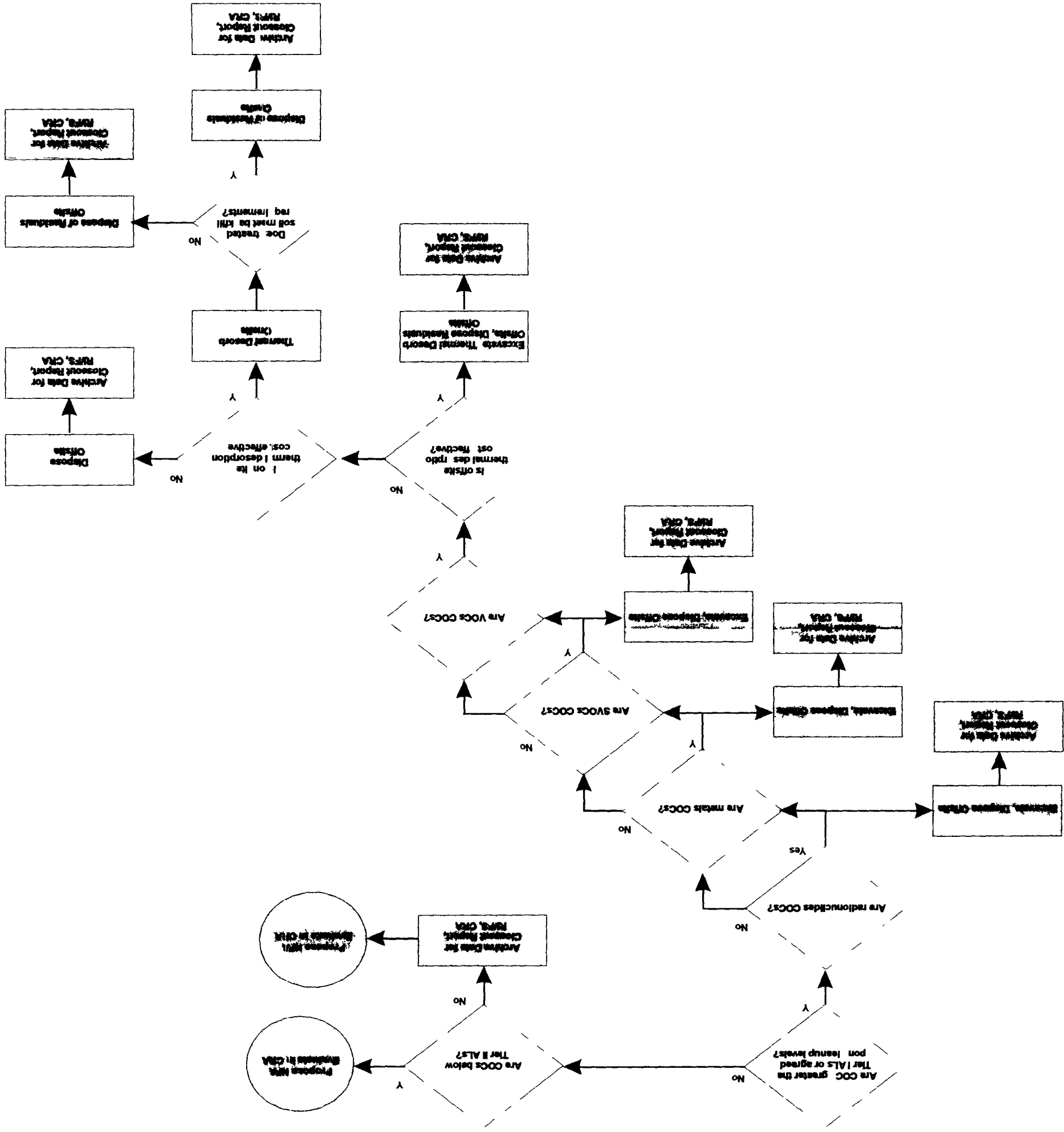
**DynCorp**

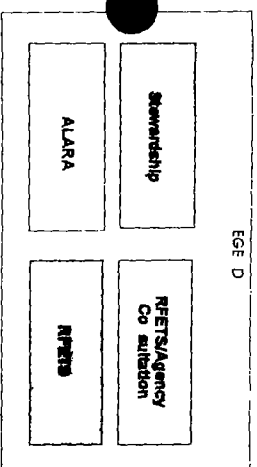
**Kaiser Hill**

Map 11: 100 Year Average Erosion Map, 100 Year, 100 Year, 100 Year



**Figure 13**  
**Soil Disposition**





## Figure 14

### Accelerated Action Summary

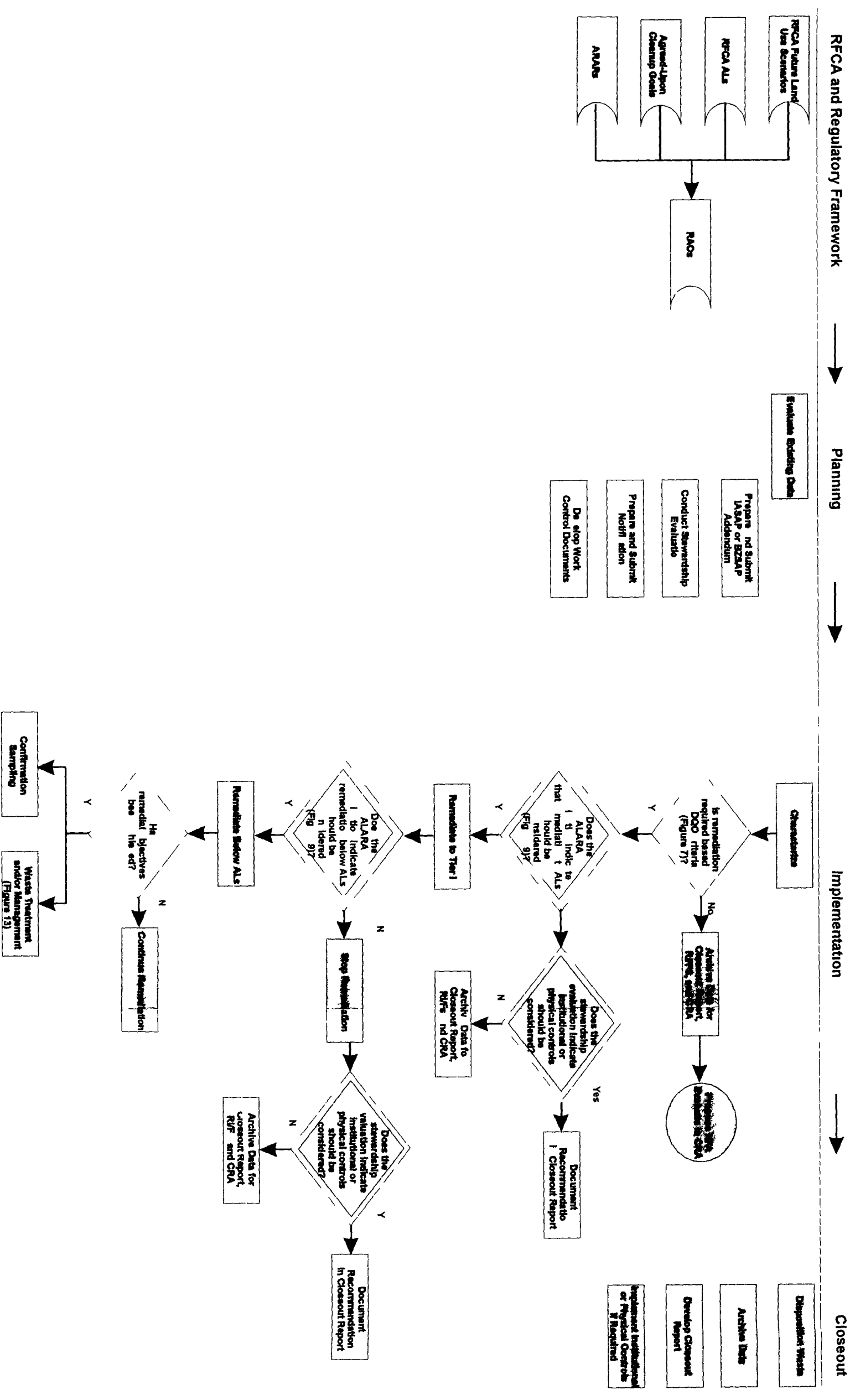


Figure 16  
Detailed Accelerated Action Process

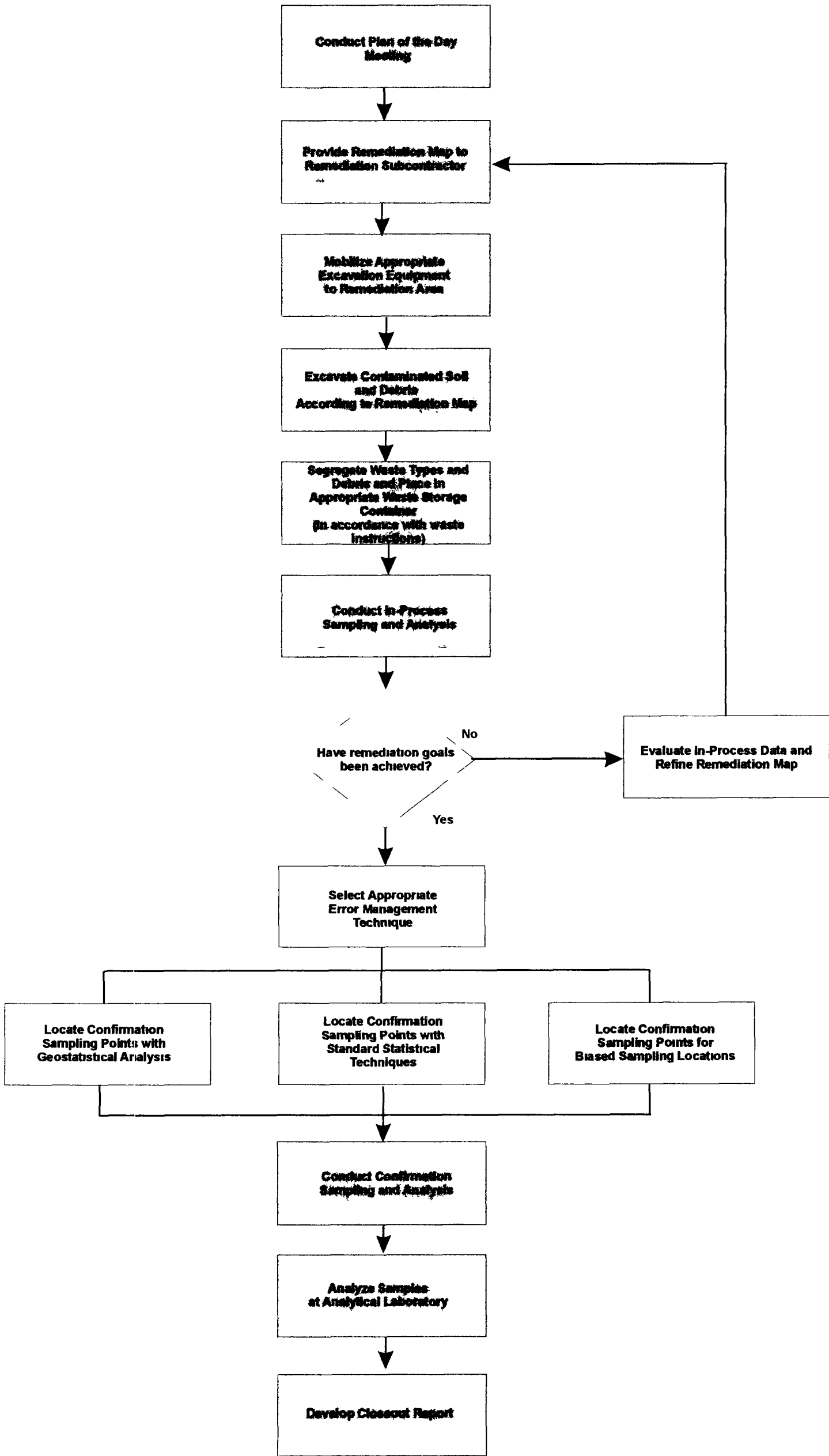
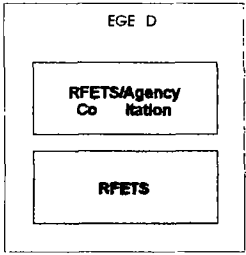


Figure 26  
Remedial Action Decision Management System Configuration

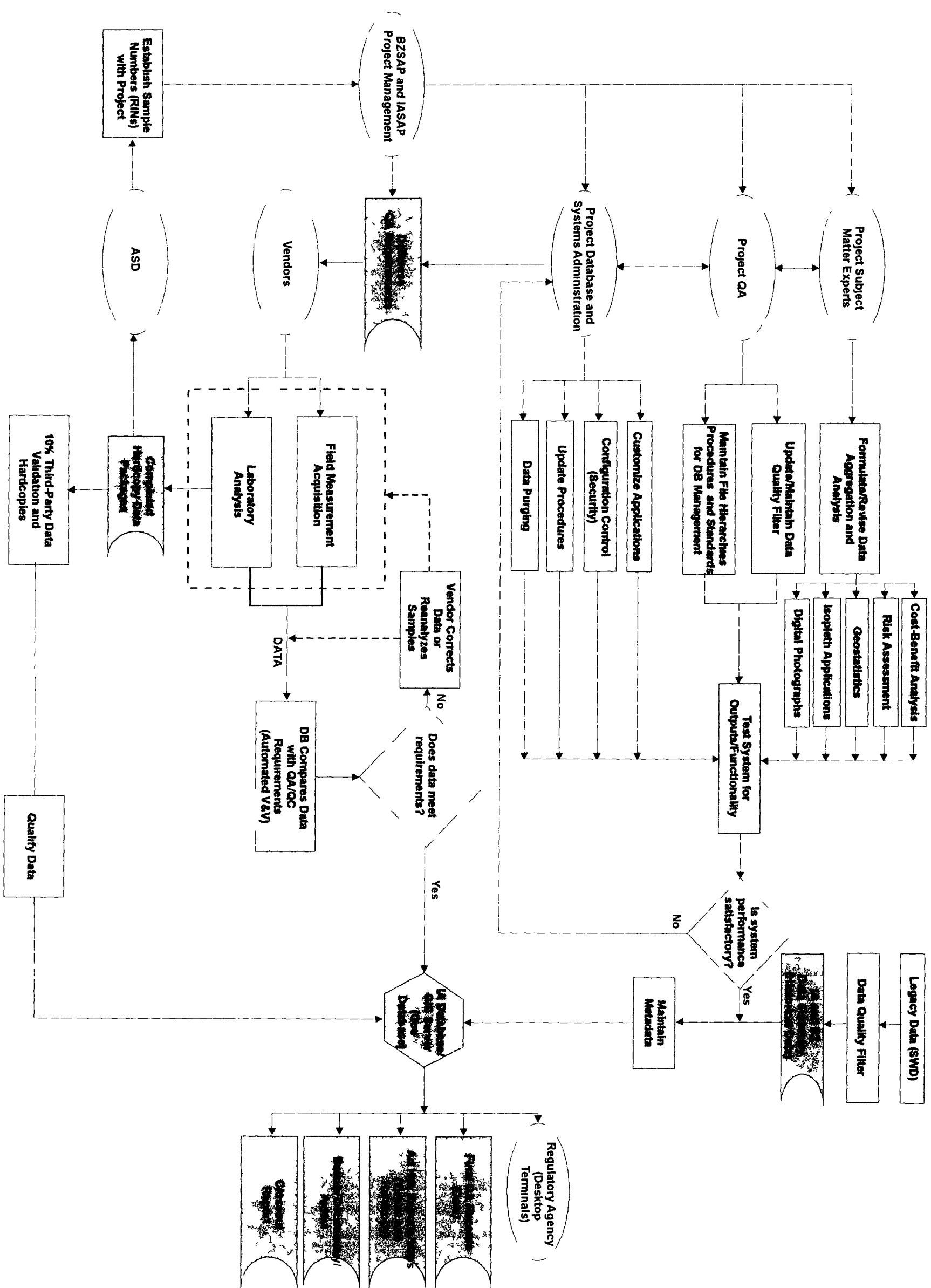




Figure 17  
RCRA Regulated Units

EXPLANATION

- RCRA Unit
- New Process Waste Lines
- Other Map Features
  - Buildings and other structures
  - Solar Evaporator Ponds (SEPs)
  - Lakes and ponds
  - Streamers, ditches or other drainage features
  - Fences and other barriers
  - Paved roads
  - Dirt roads
- Industrial Area Operable Unit Boundary

NOTES:  
1. The map shows the location of the RCRA Regulated Units (RRUs) and the Industrial Area Operable Unit (IAOU) boundary. The map also shows the location of the new process waste lines and the solar evaporator ponds (SEPs).  
2. The map is based on aerial photography and ground surveys. The map is not to scale and is not intended to be used for navigation or other purposes.  
3. The map is a preliminary map and is subject to change. The map is not a final map and is not intended to be used for legal or other purposes.

Scale 1" = 7720'  
1 inch represents approximately 643 feet

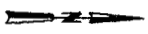
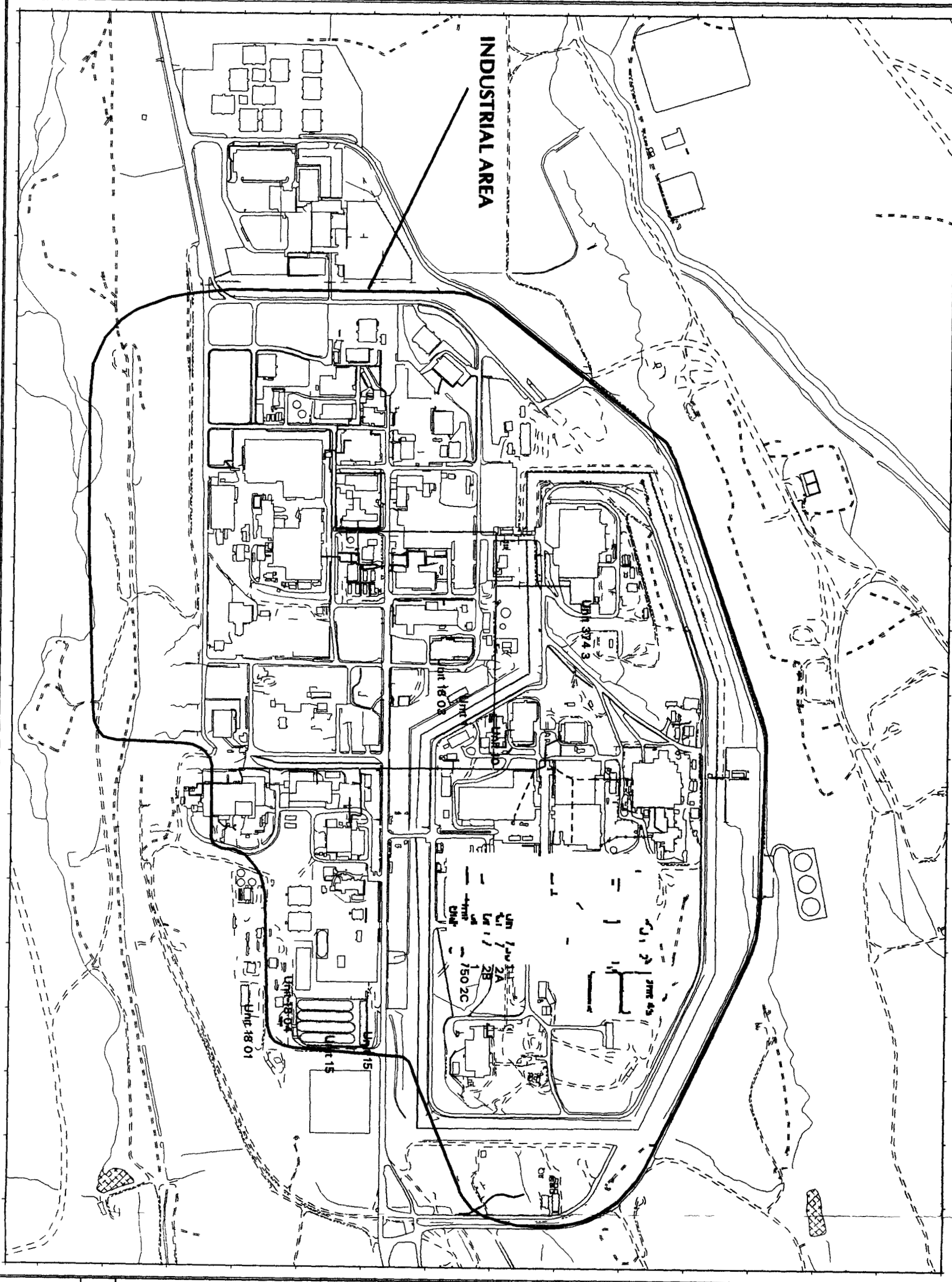
State Plane Coordinate System  
California Central Zone  
Datum NAD27

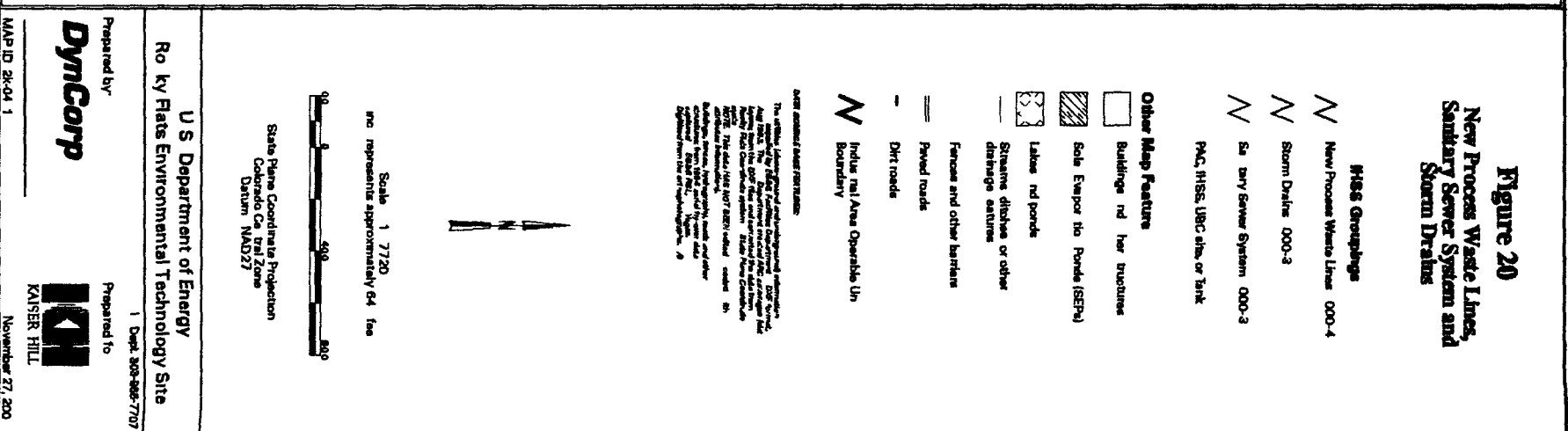
U.S. Department of Energy  
Rocky Flats Environmental Technology Site

Prepared by  
**DynCorp**  
Prepared for  
**ICM**  
Kaiser Hill

MAP ID: 01-0333 January 17, 2002

INDUSTRIAL AREA











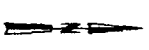


### Figure 20 New Process Waste Lines, Sanitary Sewer System and Storm Drains

- MIS Groupings**
- |   |                         |       |
|---|-------------------------|-------|
| ✓ | New Process Waste Lines | 000-4 |
| ✓ | Storm Drains            | 000-3 |
| ✓ | Sewer Saver System      | 000-3 |
- PAC, IHSS, UBC, etc. or Tank

### Other Map Feature

- |   |  |
|---|--|
|  | Buildings and other structures                   |
|  | Soil Erosion and Ponds (SEPP)                    |
|  | Lakes and ponds                                  |
|  | Streambeds, ditches or other drainage structures |
|  | Fences and other barriers                        |
|  | Paved roads                                      |
|  | Dirt roads                                       |
|  | Indian and Alaska Openable Un-Boundary           |

[illegible]

Scale 1 7720  
inc represents approximately 64 lbs



State Plane Coordinate Projection  
Colorado Central Zone  
Datum NAD27

**U S Department of Energy  
Ro ky Flats Environmental Technology Site**

Prepared by	Prepared to

**DynCorp**

**KAISER HILL**

MAP ID 2k-04 1 November 27, 200



## Figure 21

### Foundation Drains

### EXPLANATION

- Foundation Drain

## Standard Map Features

- ## Underground structures

- ☐ Buildings and other structures

- ☐
- Demolished buildings**

- 
- Solar Evaporation Ponds (SEPs)**

- ## Lakes and ponds

- drainage features**

- ### Forces and other barriers

- Topographic Contour (20 Foot)

- ## Paved roads

- FILE**

**DATA SOURCE BASE FEATURES**  
All Publications: Continuous and discontinuous data  
Users generated by the Ristic Greenwater Program

**Editor: Contact:**  
Roger Shapiro, MARS  
Ph: (650) 966-1387  
F: (650) 977-4766  
Telex: TNSC 800

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NOTE

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er	303



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State Plane Coordinate Projection  
Colorado zone one  
Datum: NAD

U.S. Department of Energy  
Environmental Technology

Key Environmental Technology Site

Prepared

**DynCorp**

Prepared





**KAISER HILL**

MAP -020

0320

November 20, 2003

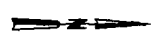


Standard Map Features	Build ing and other structure	Sole Evaporation Pond (SEPs)
		

- Fences and other barriers
- Rocky Flats boundary
- Heavy duty paved road
- Medium duty paved roads
- Light duty paved roads
- Dirt road

**DATA SOURCES AND FEATURES.** Buildings, forests, hydrography, roads and other attributes from ESRI metadata were extracted by ESRI's ArcView. Data displayed from the orthophotograph. Lands

**DECEMBER.**  
The United States Government has taken the *High Seas Trawl Fishing* Act, not *Dry-Cargo*. It has very wisely allowed not any that Americans, under any treaty's express, implied, assumed or legal liability, responsibility for the entire act, compensation, satisfaction of any individual, organization, shareholder of any individual, corporation, that could possess themselves, improve that the new would not bring any political, national rights.



Scale 1 7280  
1 inch represents approximately 3108 feet



State Plane Coordinate Projection  
Colorado Central Zone  
Datum NAD27

U S Department of Energy  
Rocky Flats Environmental Technology Site

**DynCorp**

15 Sept. 202-025-7707  
prepared to

**Abstract**

**KAISER ILL**





Figure 19-D  
Original Process Waste Lines

- EXPLANATION
- Tanks of Concern

Foamed and Stabilized Tanks  
(Source Removed)

Remaining Tanks

Process Waste IHSS Locations  
(Former OU 9 IHSSs)

Original Process Waste Lines

Location of Original Process  
Waste Lines that may have  
been removed

Pipe Currently in Use

Pipe Made of Vitrified Clay

Cannot Verify if Pipe Exists

Leaks Along the Pipe

Pipe Failed Pressure Test

Known Leaks

Manholes

Approximate Location of  
New Process Waste Lines

Valve Vault Locations

NOTE:

- Standard Map Features
- Buildings and other structures

Demolished buildings

Solar Evaporation Ponds (SEPs)

Lakes and ponds

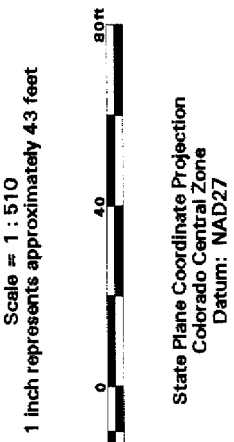
Streams, ditches, or other  
drainage features

Fences and other barriers

Paved roads

Underground tunnels

DATA SOURCE BASE FEATURES:  
Individual Hazardous Substance Sites (IHSSs)  
DOE 1992, HRI Report and Subsequent Updates.  
The IHSSs are based on the data derived from  
derived from AutoCAD files which were generated by  
IT Corporation from the DOE Work Plan, Nov. 1992  
Waste Lines (OPWL) were derived from DXF files  
DOE Work Plan, Nov. 1992.  
DOE Work Plan, Nov. 1992.  
Buildings, fences, hydrography, roads, and other  
features were derived from aerial photography data  
captured by Eagle Eye, Las Vegas.  
Digitized from the orthorectified, 195



State Plane Coordinate System  
Colorado Central Zone  
Datum: NAD27

U.S. Department of Energy  
Rocky Flats Environmental Technology Site  
GIS Dept. 303-966-7707

DRAFT

MAP ID: Vw-2

January 08, 2002

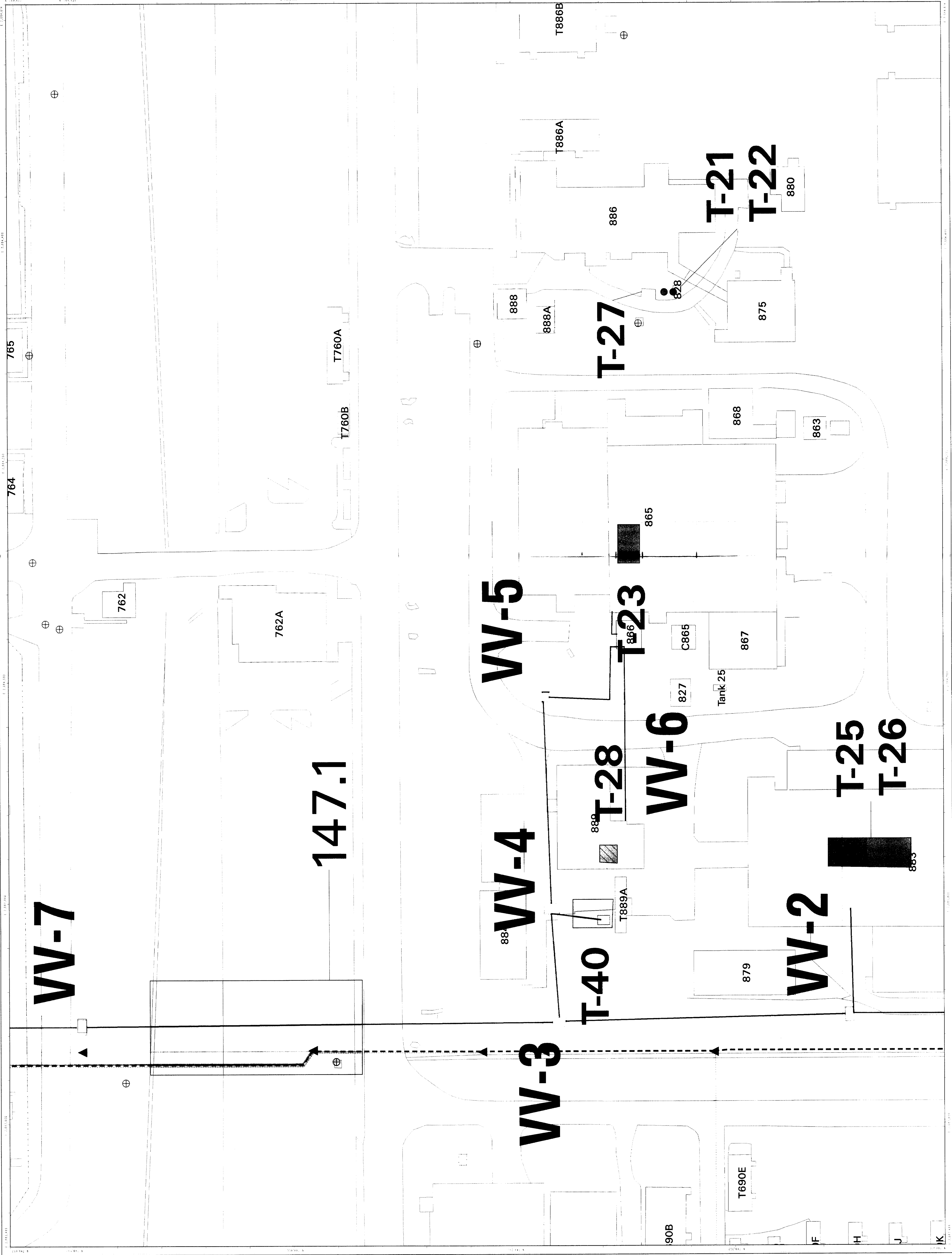


Figure 19-E  
Original Process Waste Lines

- EXPLANATION
- Tanks of Concern

Foamed and Stabilized Tanks  
(Source Removed)

Remaining Tanks

Process Waste IHSS Locations  
(Former OU 9 IHSSs)

Original Process Waste Lines

Location of Original Process  
Waste Lines that may have  
been removed

Pipe Currently in Use

Pipe Made of Vitrified Clay

Cannot Verify if Pipe Exists

Leaks Along the Pipe

Pipe Failed Pressure Test

Known Leaks

Manholes

Approximate Location of  
New Process Waste Lines

Valve Vault Locations

NOTE:







Standard Map Features

- Buildings and other structures
- Demolished buildings
- Solar Evaporation Ponds (SEPs)
- Lakes and ponds
- Streams, ditches, or other  
drainage features
- Fences and other barriers
- Paved roads
- Underground tunnels

DATA SOURCE BASE FEATURES:  
Aerial photography from 1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 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### Figure 19-F Original Process Waste Lines

## Original Process Waste Lines

EXPLANATION	
	Tanks of Concern
	Foamed and Stabilized Tanks (Source Removed)
	Remaining Tanks
	Process Waste IHSS Locations (Former OU 9 IHSSs)
	Original Process Waste Lines
	Location of Original Process Waste Lines that may have been removed
• • • •	Pipe Currently in Use
— — —	Pipe Made of Vitrified Clay
	Cannot Verify if Pipe Exists
	Leaks Along the Pipe
.....	Pipe Failed Pressure Test
	Known Leaks
	Manholes
—	Approximate Location of New Process Waste Lines
	Valve Vault Locations

**NOTE:**

## Standard Map Features

- ☐ Buildings and other structures
  - ☐ Solar Evaporation Ponds (SEPs)
  - ☐ Lakes and ponds
  - ☐ Streams, ditches, or other drainage features
  - ☐ Fences and other barriers
  - ☐ Paved roads
  - ☐ Underground tunnels

**DATA SOURCE BASE FEATURES:**  
 Individual Hazardous Substance Sites (IHSSs)  
 DOE, 1992; HRR Report and Subsequent Updates.  
 The GIS Original Process Waste Lines (OPWL) were  
 derived from AutoCAD files which were generated by  
 IT Corporation from the OU-9 Work Plan, Nov. 1992.  
 The GIS tanks associated with the Original Process  
 Waste Lines (OPWL) were derived from DXF files  
 which were generated by IT Corporation from the  
 OU-9 Workplan, Feb. 1993.  
 Buildings, fences, hydrographical roads and other  
 structures from 1994 aerial in-situ data  
 captured by EG&G ISI, Las Vegas.  
 Digitized from the orthophotographs, 1995

Scale = 1 : 370  
1 inch represents approximately 31 feet



State Plane Coordinate Projection  
Colorado Central Zone  
Datum: NAD27

U.S. Department of Energy  
Rocky Flats Environmental Technology Site

GIS Dept. 303-966-7707

**DRAFT**



Figure 4

Buffer Zone IHSS & PACs

EXPLANATION

- BZOU
- OU1
- OU5
- OU6
- OU7
- OU11
- OU16
- PAC

HRR Zone Boundary

Industrial Area Boundary

Standard Map Features

- Buildings and other structures
- Lakes and ponds
- Streams, ditches, or other drainage features
- Paved roads
- Dirt roads

DATA SOURCE BASE FEATURES:  
Buildings, fences, hydrography, roads and other structures from 1994 aerial fly-over data captured by EG&G RSL, Las Vegas. Digitized from the orthophotographs, 1/95



Scale = 1 : 8030  
1 inch represents approximately 669 feet



State Plane Coordinate Projection  
Colorado Central Zone  
Datum: NAD27

U.S. Department of Energy  
Rocky Flats Environmental Technology Site

GIS Dept. 303-966-7707

Prepared by:



MAP ID: 01-0267

July 03, 2001















### Figure 3

## Industrial Area Groups

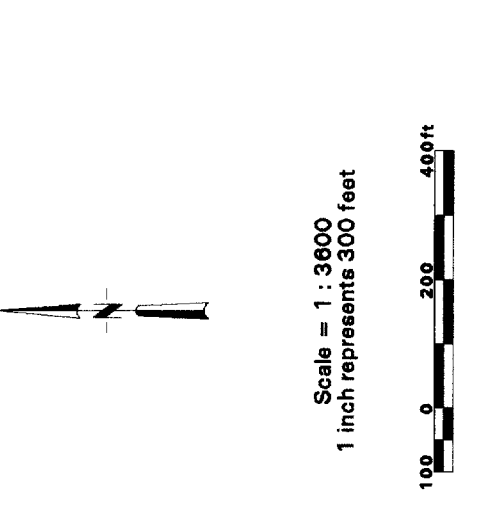
**EXPLANATION**  
**IHSS Groupings**

### Standard Map Features

- |   |   |
|---|---|
|  | Buildings and other structures                                      |
|  | Solar Evaporation Ponds (SEPs)                                      |
|  | Lakes and ponds   |
|  | Streams, ditches, or other drainage features                        |
|  | Fences and other barriers   |
|  | Paved roads   |
|  | Dirt roads  |
|  | Industrial Area Operable Unit Boundary                              |
|  | Original Process Waste Lines  |
|  | Location of Original Process Waste Lines that may have been removed |

**DATA SOURCE BASE FEATURES:**

PACS  
Historical Release Report (HRR)  
2nd Annual Update  
Sept. 30, 1997  
Individual Hazardous Substance Sites (IHSS)  
DOE, 1992, HRR Report and Subsequent Updates.  
Buildings, fences, hydrography, roads and other  
structures from 1994 aerial fly-over data  
captured by EG&G RSL, Las Vegas.  
Digitized from the orthophotographs. 1/95



U.S. Department of Energy  
Rocky Flats Environmental Technology Site  
GIS Dept. 303-96

Prepared by: \_\_\_\_\_ Prepared for: \_\_\_\_\_



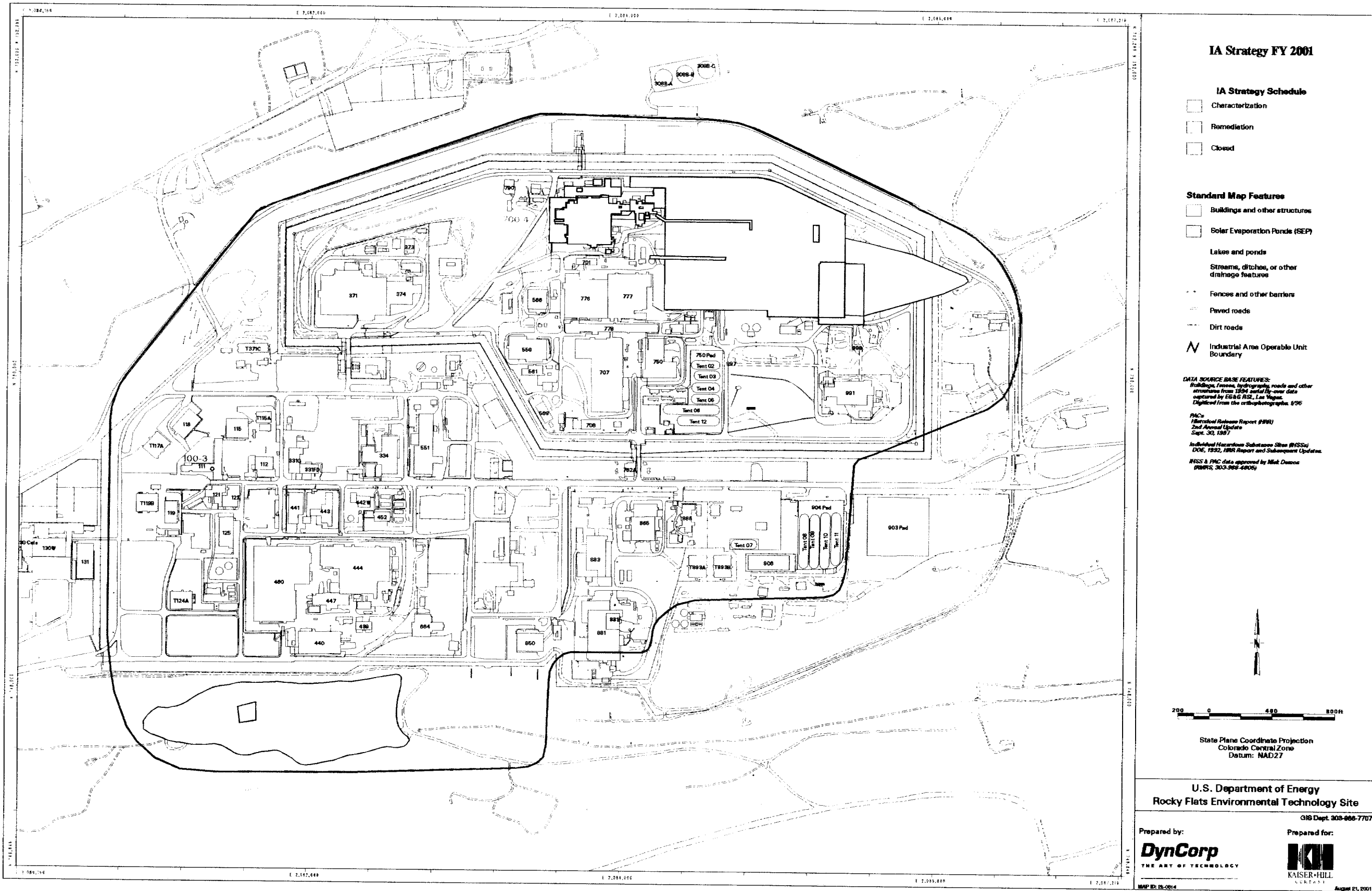
MAP ID: 01-0698  
September 10, 2001



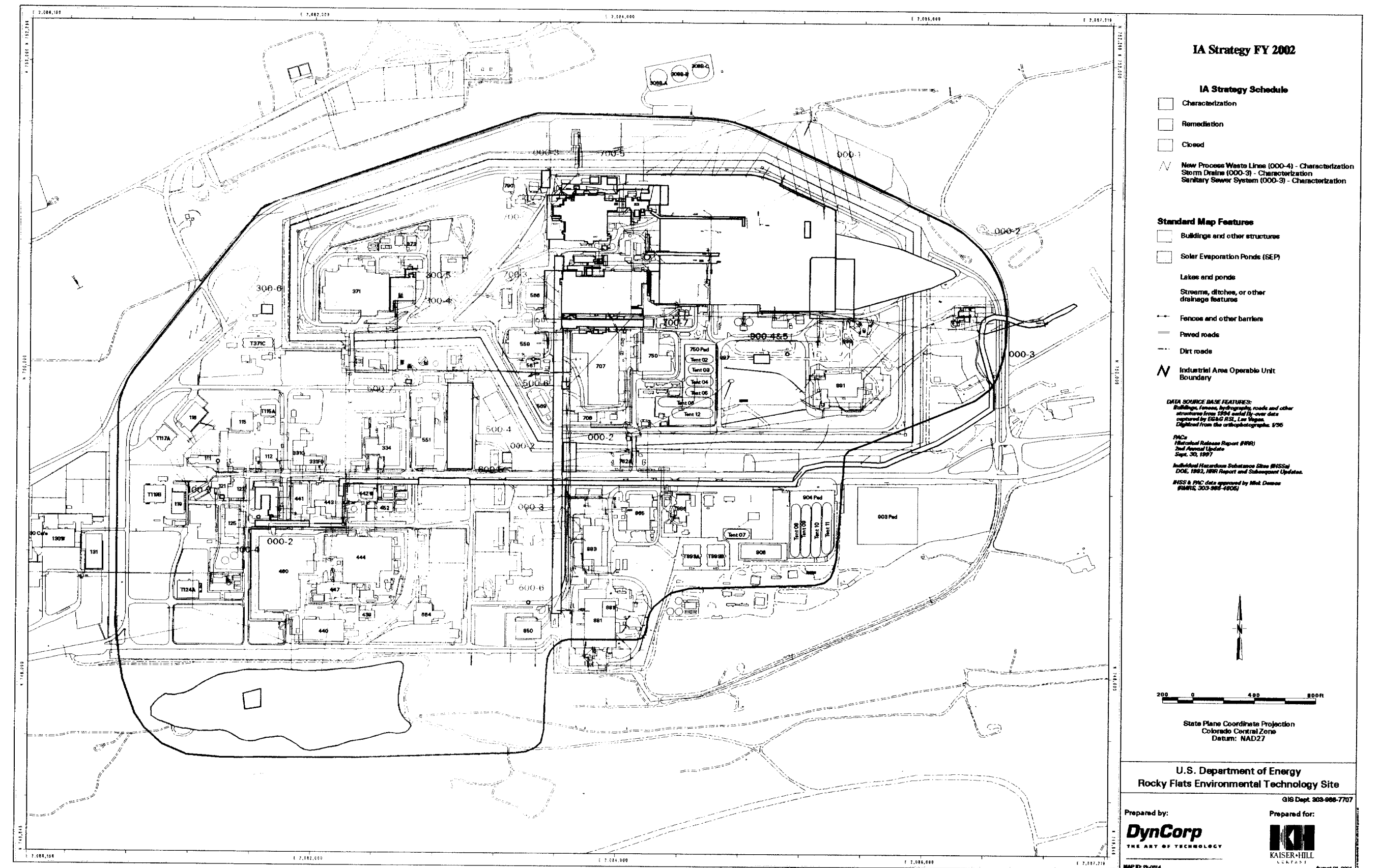
## Figure 22

### Industrial Area Schedule

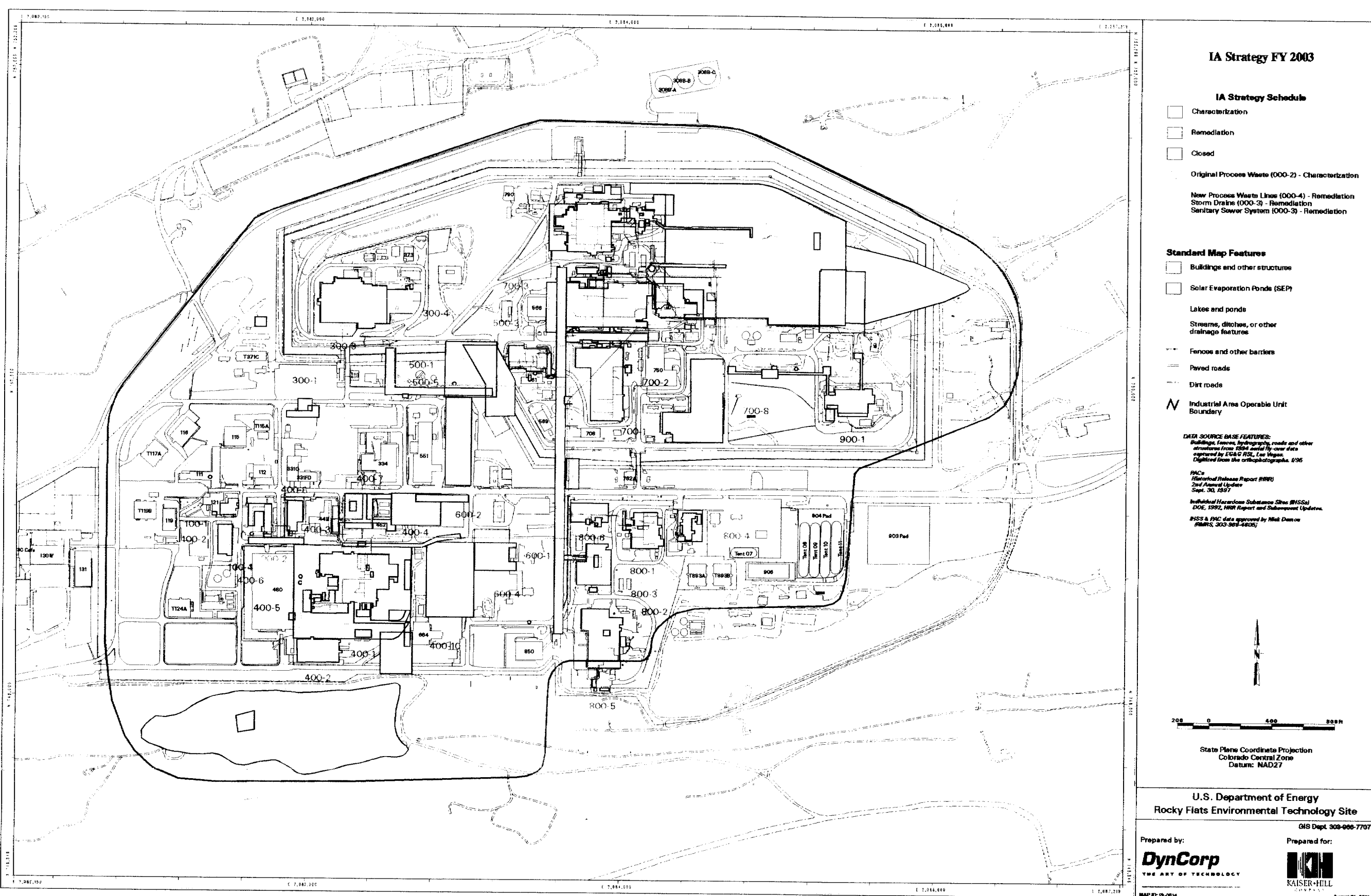
**FY 2001**



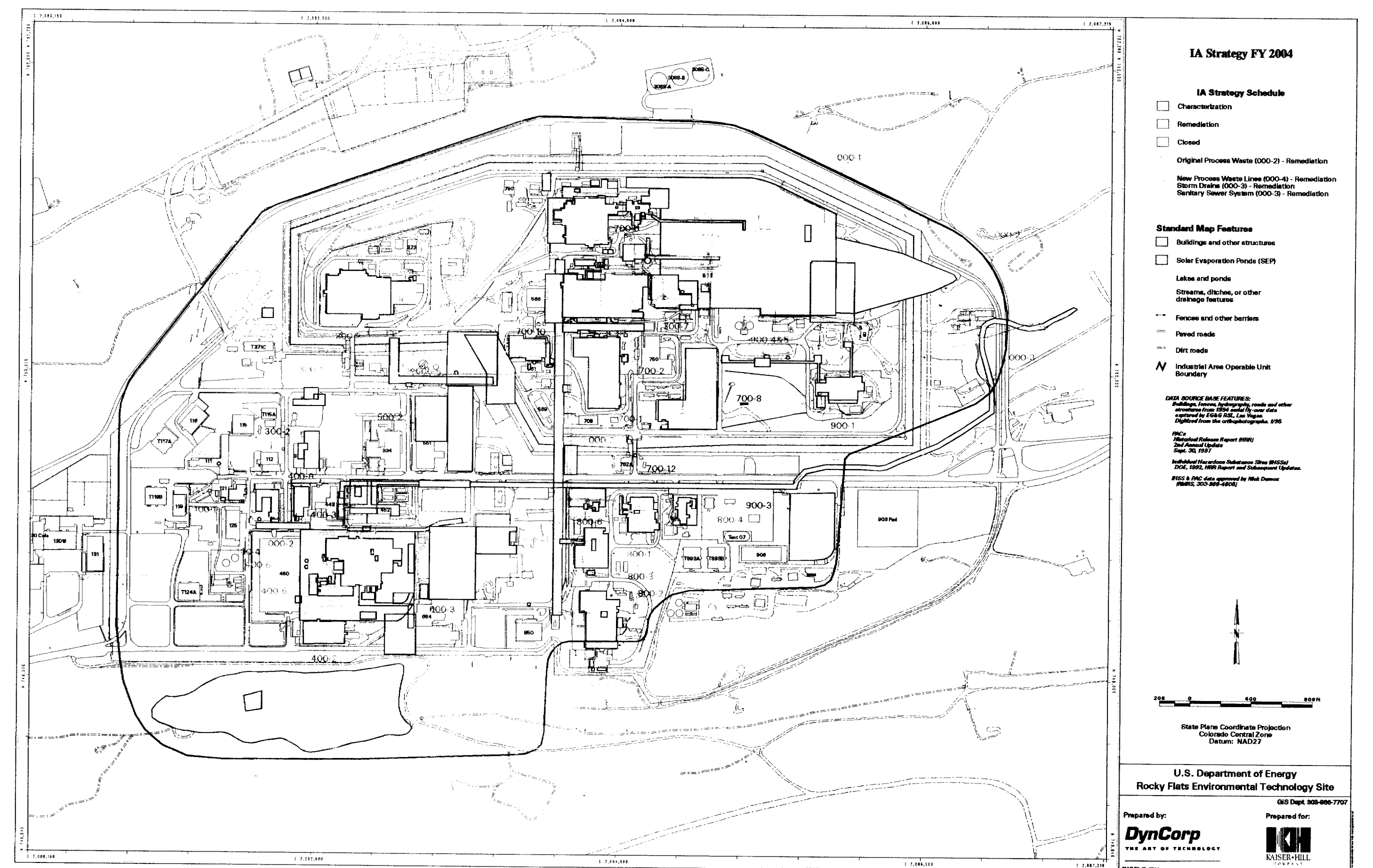
**FY 2002**



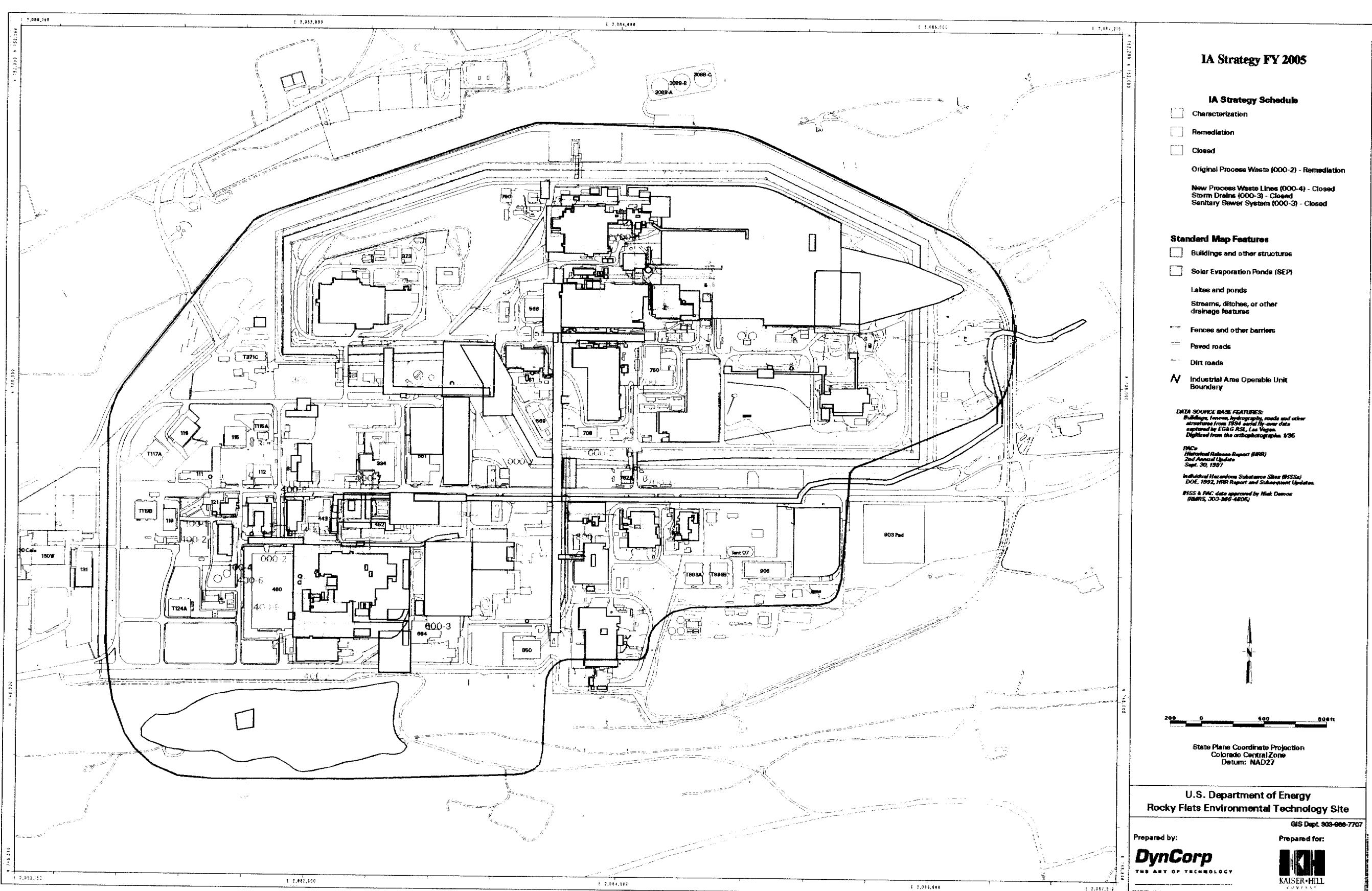
**FY 2003**



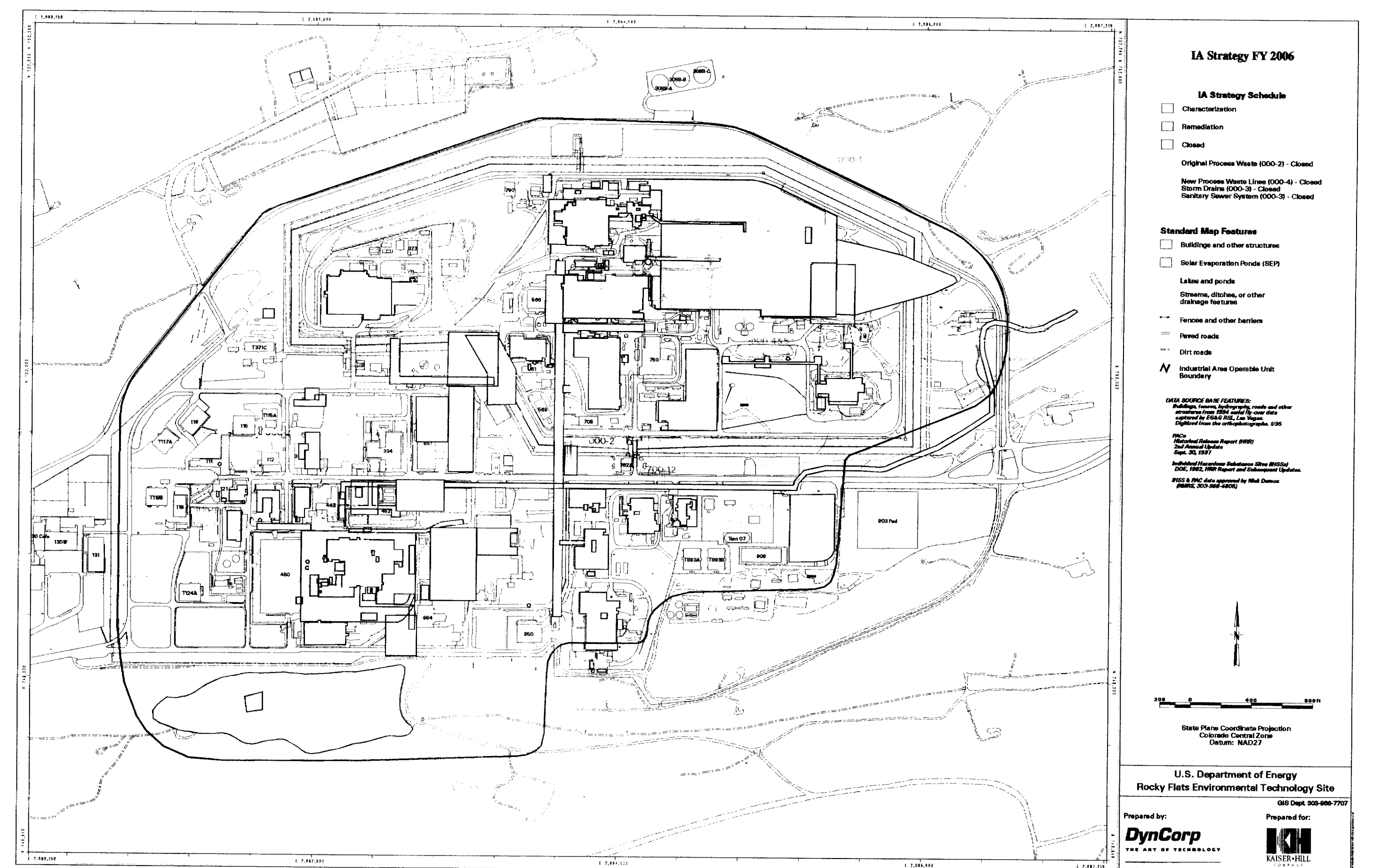
**FY 2004**



**FY 2005**



**FY 2006**





# Figure 23

## Buffer Zone Schedule

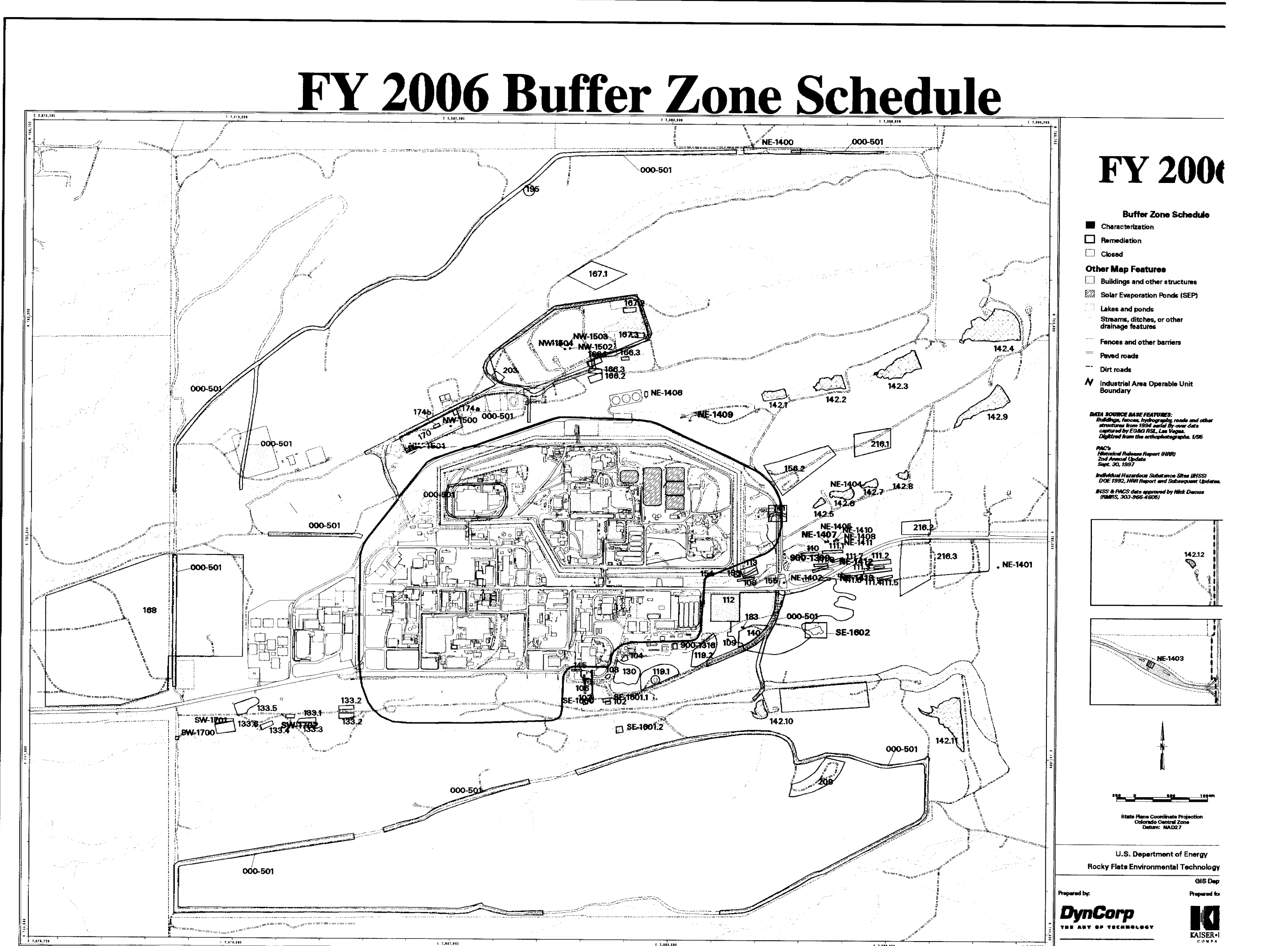
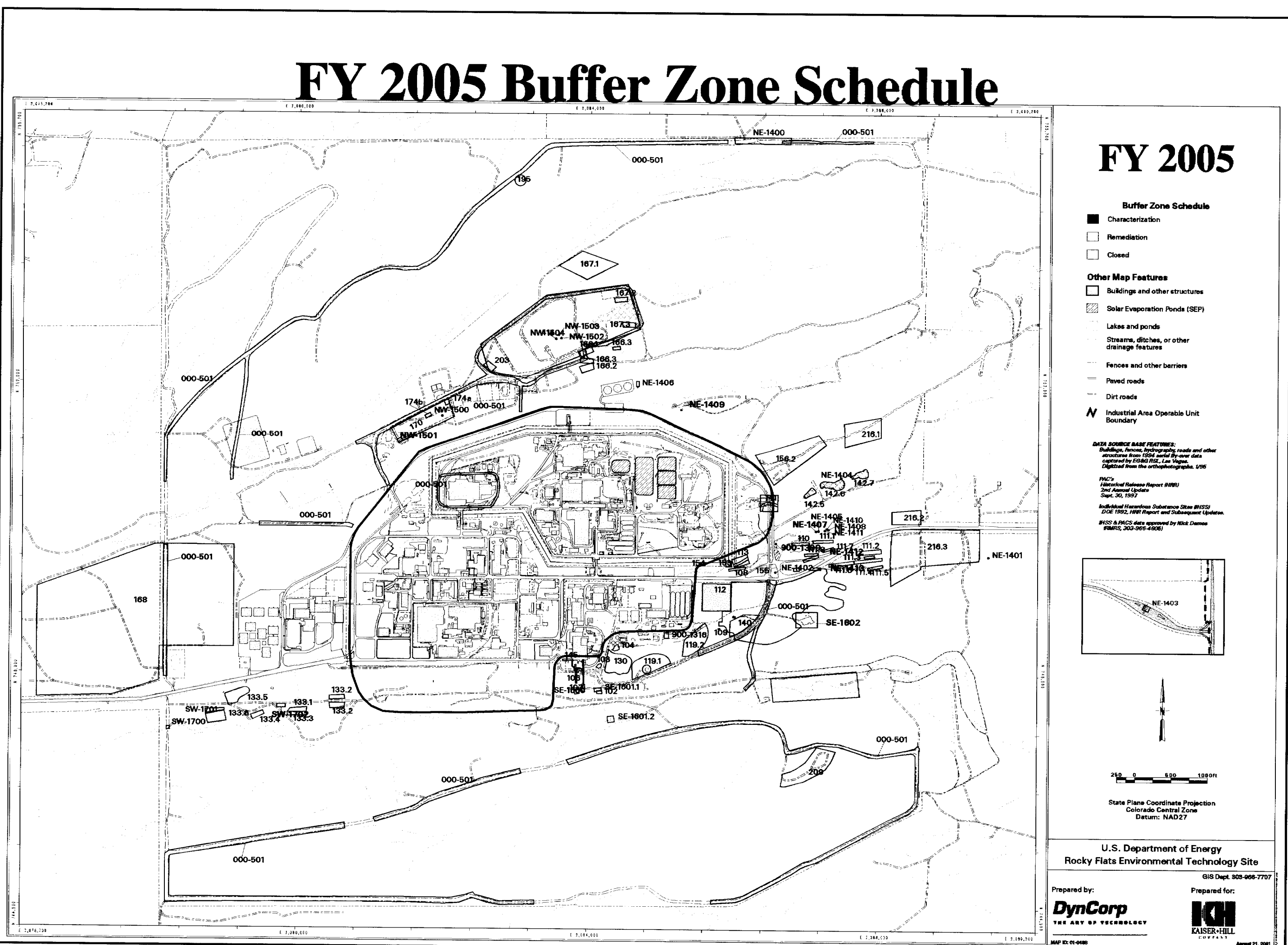
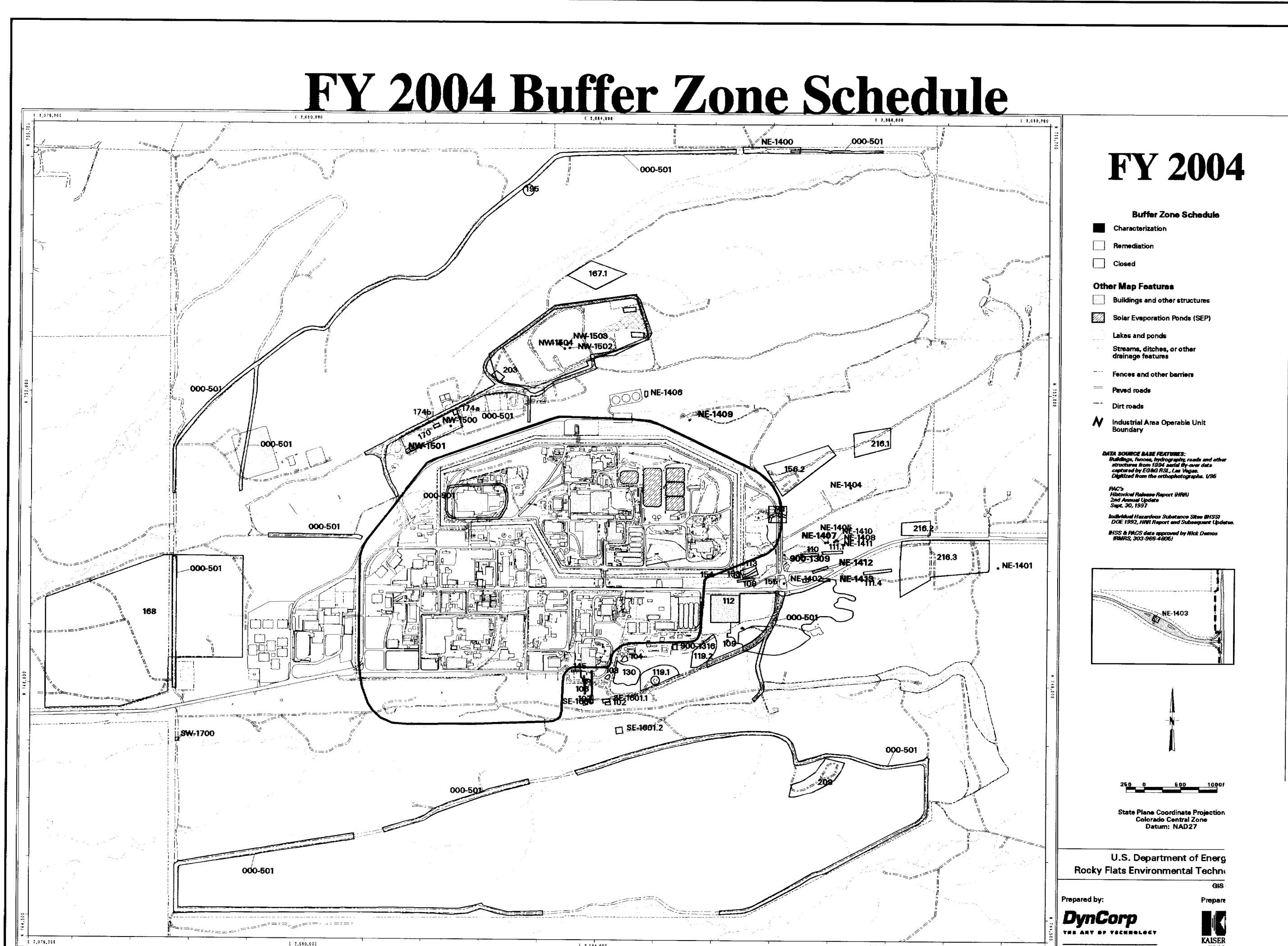
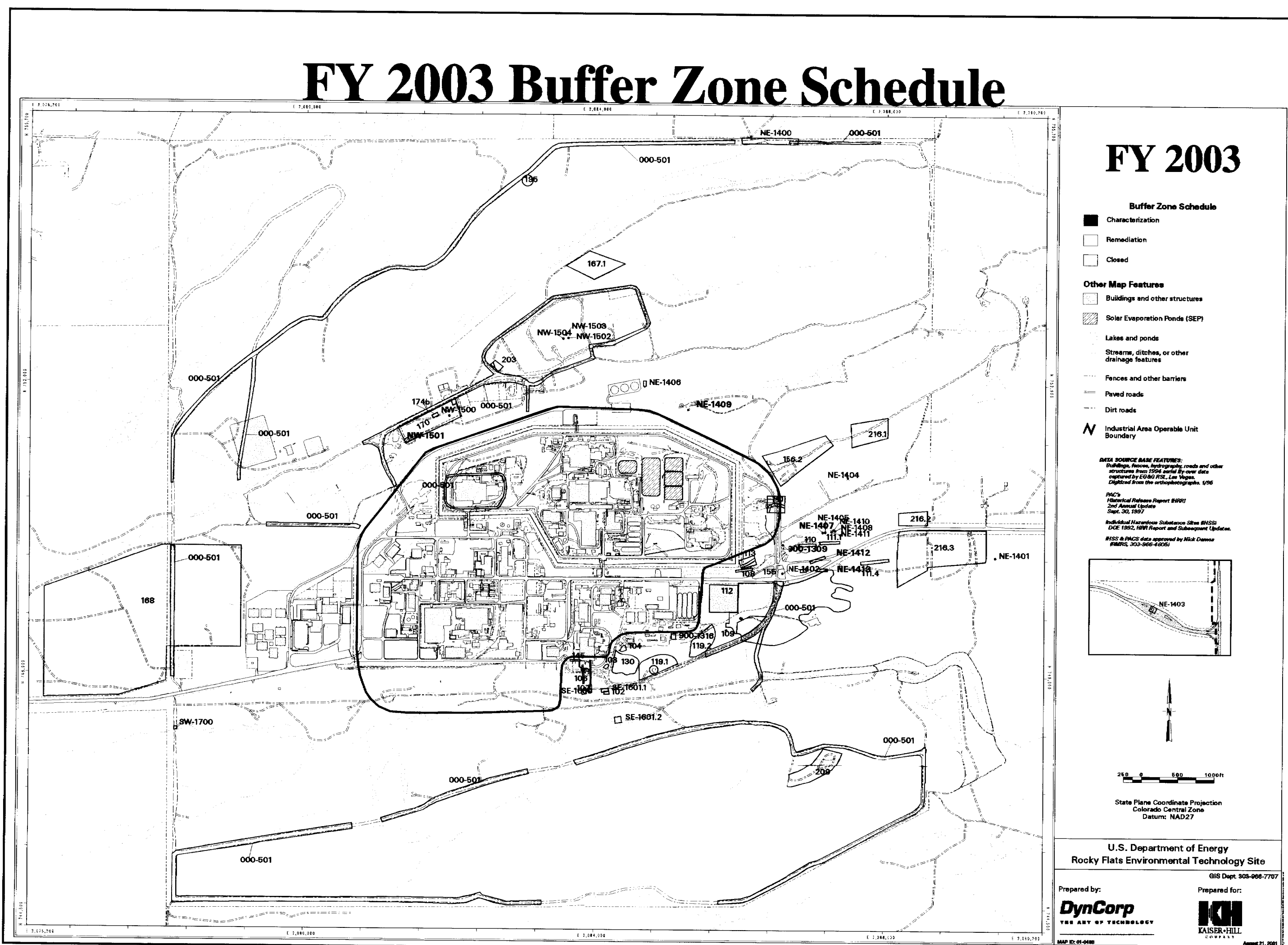
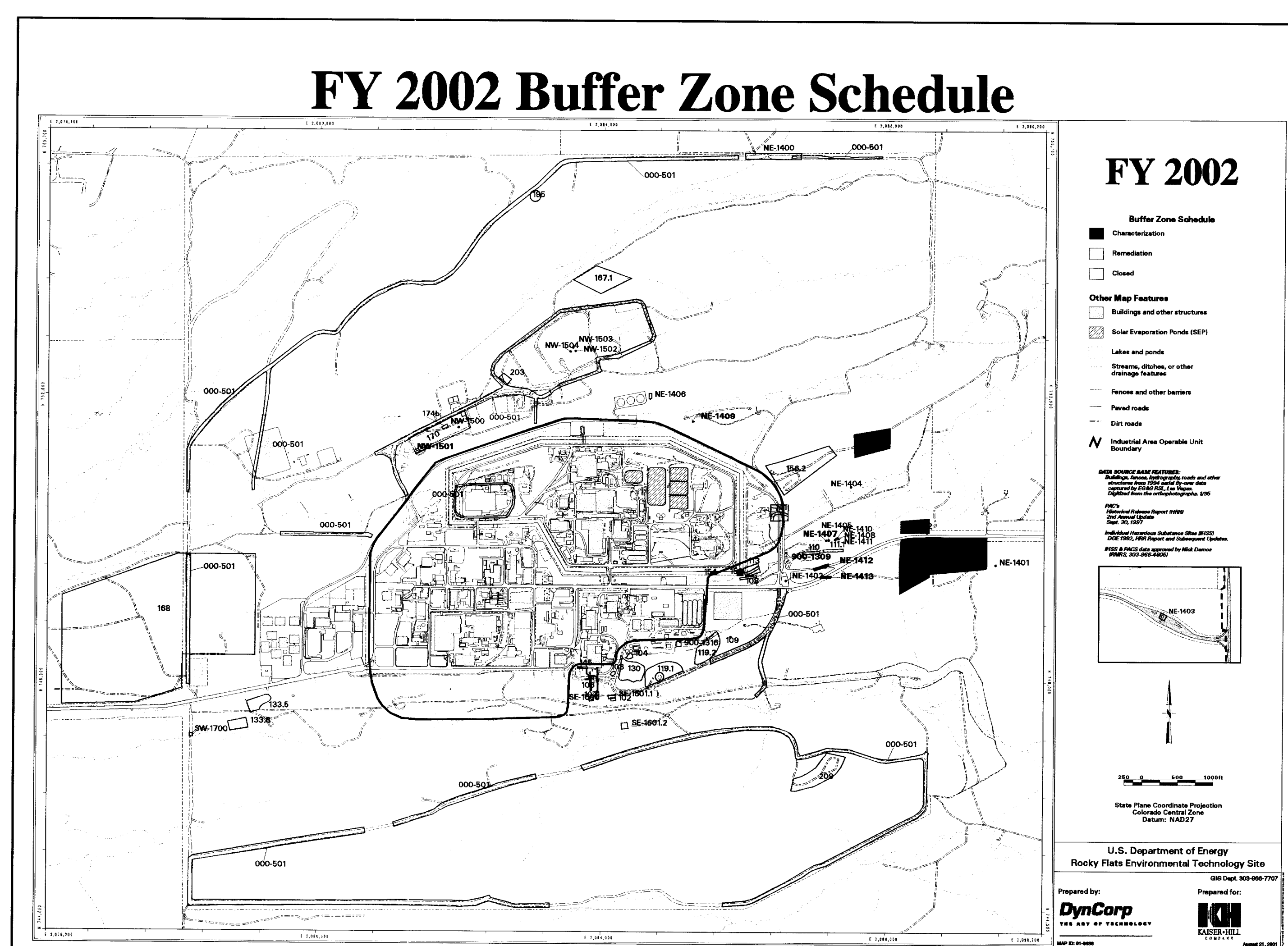
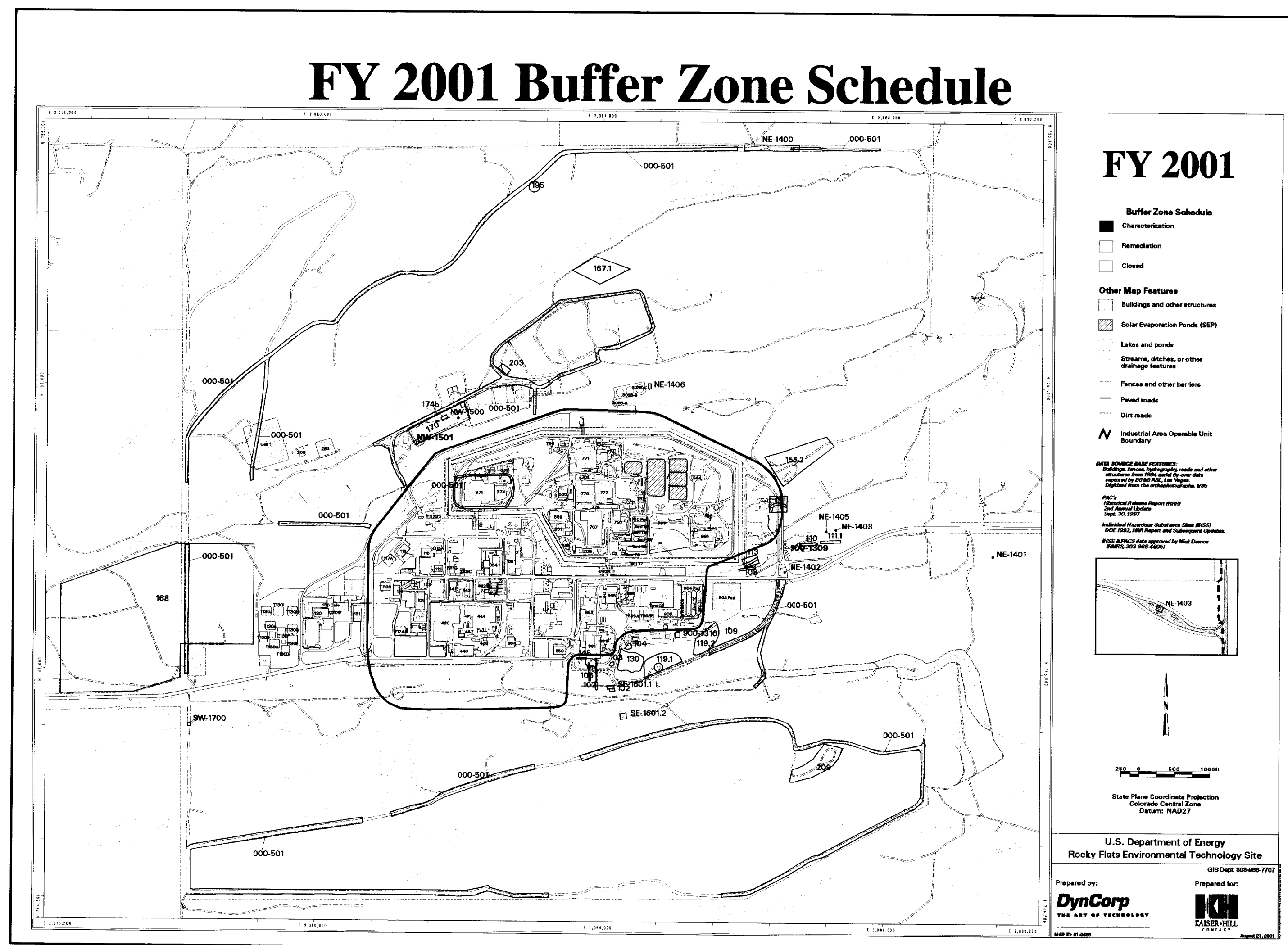




Figure 18  
Original Process Waste Lines

EXPLANATION

- Tanks of Concern
- Foamed and Stabilized Tanks (Source Removed)
- Remaining Tanks
- Process Waste IHSS Locations (Former OU 9 IHSSs)
- Original Process Waste Lines
- Location of Original Process Waste Lines that may have been removed
- Pipe Currently in Use
- Pipe Made of Vitrified Clay
- Cannot Verify if Pipe Exists
- Leaks Along the Pipe
- Pipe Failed Pressure Test
- Known Leaks
- Manholes
- Approximate Location of New Process Waste Lines
- Valve Vault Locations

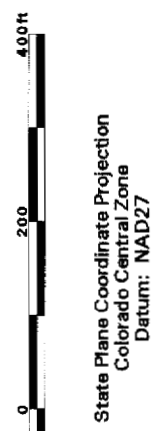
NOTE:

Standard Map Features

- Buildings and other structures
- Demolished buildings
- Solar Evaporation Ponds (SEPs)
- Lakes and ponds
- Streams, ditches, or other drainage features
- Fences and other barriers
- Paved roads
- Underground tunnels

DATA SOURCE AND FEATURES:  
The 1995 Original Process Waste Lines (OPWL) were by IT Corporation from the 1995 Work Plan, New 1992 Waste Lines (OWL) were from the 1992 Work Plan, which were generated by IT Corporation from the buildings, fences, hydrography, roads and other structures from 1994 aerial fly-over data. Digitized from the orthophotographs, 1995.

Scale = 1:24,600  
1 inch represents 205 feet



State Plane Coordinate Projection  
Colorado Central Zone  
Datum: NAD27

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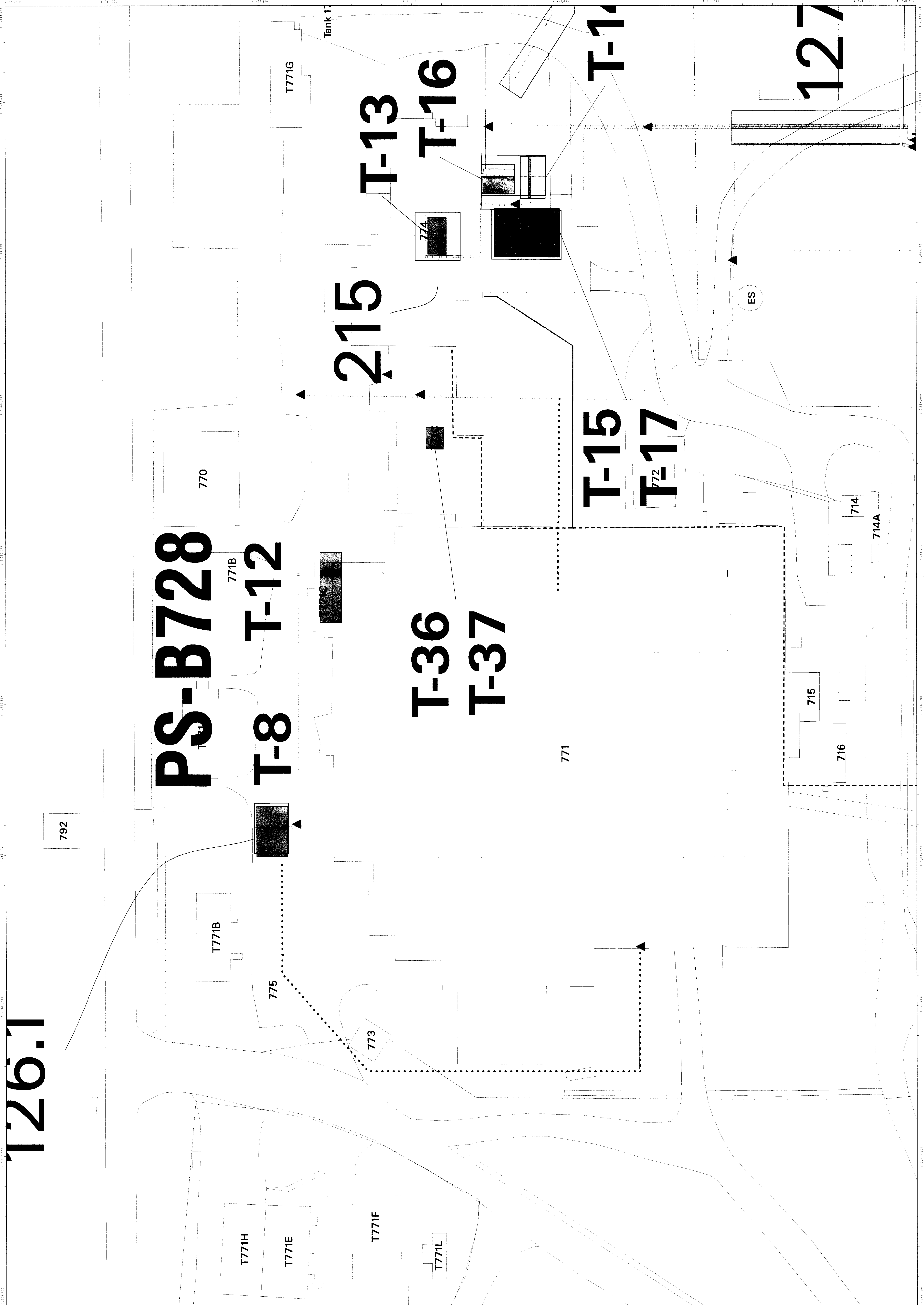
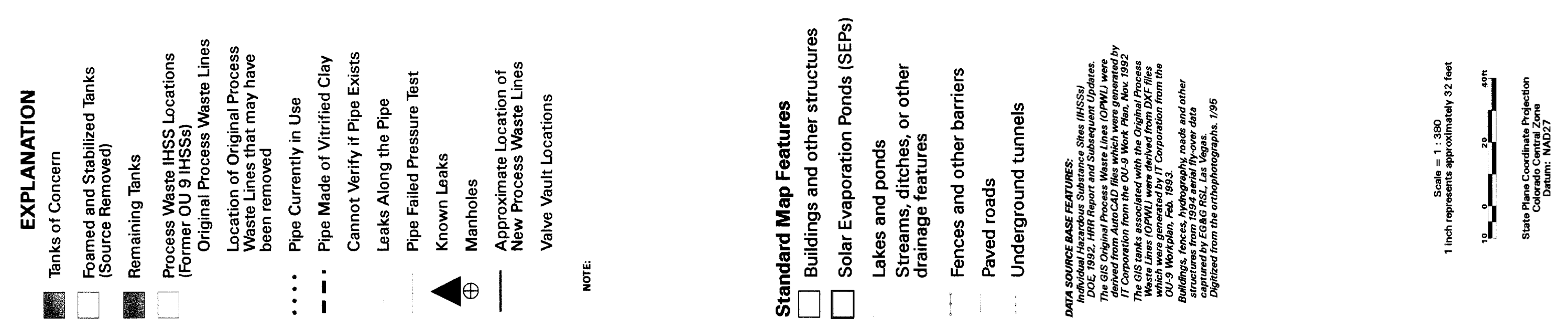
DRAFT

MAP ID: \*\*\*Draft\*\*\*

January 08, 2002




**Figure 19-A**  
**Original Process Waste Lines**



**DATA SOURCE BASE FEATURES:** The *Site* (HHSJ) was derived from the DOE, 1982, HRI Report and Subsequent Updates. The *GIS Original* *Waste Tanks* (OPNW) were derived from AutoCAD files which were generated by IT Corporation from the OU-9 Work Plan, Nov. 1992. The *GIS tanks* associated with the *Original* *Waste Tanks* (OPNW) were derived from DXF files which were generated by IT Corporation from the OU-9 Workplan, Feb. 1993. Buildings, fences, hydrography, roads and other features were derived from aerial data captured by ES&G RSL, Las Vegas. Digitized from the orthophotographs, 1/95

Scale = 1 : 380  
1 inch represents approximately 32 feet










State Plane Coordinate Projection  
Colorado Central Zone  
Datum: NAD27

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**Figure 19-B**  
**Original Process Waste Lines**

EXPLANATION	
	Tanks of Concern
	Foamed and Stabilized Tanks (Source Removed)
	Remaining Tanks
	Process Waste IHSS Locations (Former OU 9 IHSSes)
	Original Process Waste Lines
	Location of Original Process Waste Lines that may have been removed
• • • •	Pipe Currently in Use
- - -	Pipe Made of Vitrified Clay
	Cannot Verify if Pipe Exists
	Leaks Along the Pipe
	Pipe Failed Pressure Test
	Known Leaks
	Manholes
	Approximate Location of New Process Waste Lines
	Valve Vault Locations

**NOTE:**

## Standard Map Features

- ☐ Buildings and other structures
  - ☐ Demolished buildings
  - ☐ Solar Evaporation Ponds (SEPs)
  - Lakes and ponds
  - Streams, ditches, or other drainage features
  - Fences and other barriers
  - Paved roads
  - Underground tunnels

**DATA SOURCE BASE FEATURES:**

- *Chemical Hazardous Substance Sites (IHSSs)*
- *DDE, 1932; HRR Report and Subsequent Updates.*
- *The GIS Original Process Waste Sites (OPWL) were derived from AutoCAD files which were generated by the U.S. Environmental Protection Agency (EPA) in 1992.*
- *IT Corporation from the OLS Work Product.*
- *The GIS tanks and waste pits were derived from DXF files which were generated by IT Corporation from the OLS WorkPlan, Feb. 1993.*
- *Buildings, fences, hydrographic roads and other structures from 1954 aerial fly-over data captured by ERI, Inc. in the orthophotographs, 1954.*

Scale = 1 : 570  
1 inch represents approximately 48 feet

State Plane Coordinate Projection  
Colorado Central Zone  
Datum: NAD27

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MAP ID: Vol.2

January 08 2002

